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Steve Thompson
T079 v.3



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APR 21 2009

Air/Toxics & Inspection
Coordination Branch
6EN-A

CERTIFIED MAIL: Return Receipt Requested (7007 0220 0000 4422 4954)

April 13, 2009

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
January 1, 2009 to March 31, 2009
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Meilburg

Page 2

- Pursuant to 61.357(d)(7)(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

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APR 21 2009

Air/Toxics & Inspection
Coordination Branch
CEN-A

Table 1

**Rhodia Inc.
Houston, Texas**

**Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: March 31, 2009**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
Initial and annual Method 21 inspections of containers per 61.345(a)(1)	x Yes Except as Noted	
Initial and quarterly visual inspections of containers per 61.345(b)	x Yes Except as Noted	
Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii)	x Yes Except as Noted	
Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f)	x Yes Except as Noted	
Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c)	x Yes Except as Noted	

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

AI/AI/CO

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CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7007 0220 0000 4422 4862)

March 24, 2009

Ms. Becky Weber
Associate Division Director for Air Programs (6PD)
U.S. EPA – Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

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MAR 31 2009

RE: Benzene Waste Operations NESHAP
Industrial Solid Waste Registration No. 31019
Hazardous Waste Permit No. HW-50095-001
40 CFR Part 61, Subpart FF
EPA ID No. TXD008099079

Air/Toxics & Inspection
Coordination Branch
6EN-A

Dear Ms. Weber:

Enclosed please find a report for the 2008 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 103.0 megagrams for the operating year 2008.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2008.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson
Environmental Manager

Attachment

CC: Air Section Manager, TCEQ, Region 12, Houston
Arturo Blanco, City of Houston, Bureau of Air Control

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Rhodia Inc.
Houston, Texas
Calendar Year 2008 Report

40 CFR 61 Subpart FF - Benzene Annual Report

61.357(a)(2)		61.357(a)(3)(i)	61.357(a)(3)(ii)	61.357(a)(3)(iii)	61.357(a)(3)(iv)	61.357(a)(3)(v)	61.357(a)(3)(vi)
Waste Stream	Controlled Benzene Emissions	Water Content of Waste Stream >10%	Waste Stream a Process Wastewater Stream, Product Tank Drawdown, or Landfill Leachate	Annual Waste Quantity (Mg/yr)	Range of Benzene Concentration (ppmw)	Annual Average Flow Weighted Benzene Concentration (ppmw)	Annual Benzene Quantity (Mg/yr)
808006	Y	N	N	394.0	0-10,000	10,000	3.9
9808003	Y	Y	Y	55.2	0-100,000	100,000	5.5
9109003	Y	Y	Y	446.4	0-10	10	0.0
0411008	Y	Y	Y	105.5	0-10	10	0.0
808007	Y	Y	Y	19.4	1,000-7,500	7,500	0.1
710004	Y	N	N	1824.2	0-10,000	10,000	18.3
9104004	Y	N	N	70.4	10-200	200	0.0
804007	Y	N	N	23.3	0-500	500	0.0
0312002	Y	N	N	1466.9	10,000-50,000	50,000	73.4
9612008	Y	Y	Y	28.5	10-10,000	10,000	0.3
9405021	Y	Y	Y	690.4	10-2,000	2,000	1.4
Y=Yes, N=No		Y=Yes, N=No	Y=Yes, N=No	TOTAL			103.0 Mg/yr

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CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 0666)

MAY 4 2010

Air/Toxics & Inspection
Coordination Branch
GEN 1

April 29, 2010

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
January 1, 2010 to March 31, 2010
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh

Page 2

- Pursuant to 61.357(d)(7)(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Sam Keen at (713) 924-1484 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

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MAY 4 2010

Air/Toxics & Inspection
Coordination Branch
APR 29 2010

Table 1

Rhodia Inc.
Houston, Texas

**Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: March 31, 2010**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
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Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f)	x Yes Except as Noted	
Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c)	x Yes Except as Noted	

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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AUG 13 2010



CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1137)

August 10, 2010

Mr. Esteban Herrera
Chief, Toxics Enforcement Section
Compliance Assurance and Enforcement Section
Air/Toxics and Inspection Coordination Branch
US EPA Region 6
1445 Ross Avenue (6EN-A)
Dallas, TX 75202-2733

Re: Rhodia Inc.
Houston, Texas Facility
Notification of Tanks Subject to NSPS Subpart Kb (40 CFR 60.110b)

Dear Mr. Herrera:

Rhodia Inc. currently operates Sulfuric Acid Regeneration Unit No. 2 (Regen 2) (TCEQ Air Permit No. 4802) at its Houston facility. Regen 2 receives spent sulfuric acid via truck, barge and rail for recycling in its industrial furnace. Regen 2 is also permitted as a RCRA Boiler and Industrial Furnace (TCEQ Permit No. HW-50095-001) to manage liquid hazardous waste materials. The spent sulfuric acids and liquid hazardous wastes can either be direct-burned or placed in storage tanks prior to being burned. Spent sulfuric acid often contains volatile organic liquids (VOL). The liquid hazardous wastes routinely contain VOL.

Rhodia has revised the operating plan to correct an incorrect regulatory citation and is submitting it for agency approval. This operating plan covers all onsite tanks subject to NSPS Subpart Kb.

If you should have any questions, please contact me at (713) 924-1408.

Sincerely,

W. F. Dickerson
Environmental Manager

Attachment

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Cc: Mr. Mark R. Vickery, P.G.
Executive Director, MC-109
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Avenue, Suite H
Houston, TX 77023-1486

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

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AUG 13 2010

Permit & Inspection
 Enforcement Branch
 EN-A

**NSPS Subpart Kb Operating Plan per 40 CFR 60.113b(c)(1)
 Rhodia Houston, Texas Plant
 Revision 7**

Rhodia is modifying the Operating Plan to comply with the NSPS Subpart Kb requirements as they apply to hazardous waste and spent sulfuric acid storage tanks at the Houston Plant. Submittal of an Operating Plan is required by 40 CFR 60.113b(c)(1).

The Houston plant has the following tanks that are subject to vapor control per 40 CFR 60.112b. These tanks use a closed vent system and control devices as the method of compliance per 40 CFR 60.112b(3).

Tank	Unit	Contents	Control Device
B1	Treatment Services	VOL	Regen 2 Furnace with a Vapor Combustor as Backup
B2	Treatment Services	VOL	Regen 2 Furnace with a Vapor Combustor as Backup

In addition, the following tanks have the potential to contain material that is subject to vapor control per 40 CFR 60.112b. These tanks use a closed vent system and control device as the method of compliance per 40 CFR 60.112b(3).

Tank	Unit	Contents	Control Device
48	Sulfuric Acid Manufacturing	VOL	Regen 2 Furnace with a Vapor Combustor as Backup
49	Sulfuric Acid Manufacturing	VOL	Regen 2 Furnace with a Vapor Combustor as Backup
53	Sulfuric Acid Manufacturing	VOL	Regen 2 Furnace with a Vapor Combustor as Backup
56*	Sulfuric Acid Manufacturing	VOL	Regen 2 Furnace with a Vapor Combustor as Backup
78*	Sulfuric Acid Manufacturing	VOL	Regen 2 Furnace with a Vapor Combustor as Backup

* These tanks have not been reconstructed or modified since 1984, but are listed for completeness.

This plan must document that the tank vent control system will achieve the required 95% control efficiency.

Tanks B1 and B2

Tanks B1 and B2 are fixed roof tanks vented through a closed vent manifold system to either the Regeneration Unit No. 2 (Regen 2) industrial furnace or to the Treatment Services vapor combustor (TSVC). Regen 2 is the primary control system and the TSVC serves as an emergency backup control device. Both of these control systems achieve VOC control efficiencies in excess of 95%, as described below.

(1) Regeneration Unit No. 2 (EPN 104)

The Regen 2 industrial furnace provides temperatures in excess of 816°C and destruction of VOCs in excess of 99.99% as demonstrated in the trial burn for the Regen 2 RCRA Boiler and Industrial Furnace (BIF) permit. Section 60.113b(c)(i) of Subpart Kb allows the documentation of the existence of these conditions to be sufficient for the control system to meet the VOC destruction requirement. Attachment 1 contains a summary table of the trial burn results for Regen 2.

Rhodia monitors temperatures in the Regen 2 industrial furnace and will ensure that the average hourly furnace temperatures remains above 815°C (1,500°F) whenever Tanks B1 and B2 are vented to Regen 2. The temperature in the Regen 2 industrial furnace is maintained between 1,800°F to 2,100°F. The design of the Regen 2 industrial furnace is such that residence times in excess of 0.75 seconds are always maintained. The residence time in the Regen 2 industrial furnace is 2 to 4 seconds.

(2) Treatment Services Vapor Combustor (EPN 120)

- The residence time for the Treatment Services vapor combustor is as follows:

Stack Diameter (inner diameter) = 6 feet

Combustion Zone = 28 feet

$$\text{Residence Time} = \frac{\text{Stack Volume}}{\text{Gas Flow (acfm)}} = \frac{\text{Pi (3)}^2(28)}{25,450}$$

$$= 0.0311 \text{ minutes} = 1.86 \text{ seconds}$$

- The minimum temperature for the Treatment Services vapor combustor is as follows:

Rhodia utilizes a log sheet when the vapor combustor is in service when the Regen 2 industrial furnace is not operational. A copy can be found in Attachment 2. The temperature is tracked on the Distributed Control System and all data is maintained for five (5) years.

Tanks 48, 49, 53, 56, and 78

Tanks 48, 49, 53, 56, and 78 are fixed roof tanks vented through a closed vent manifold system to either the Regen 2 industrial furnace or to the spent acid vapor combustor (SAVC). Regen 2 is the primary control system and the SAVC serves as an emergency backup control device. Both of these control systems achieve VOC control efficiencies in excess of 95%, as described below.

(1) Regeneration Unit No. 2 (EPN 104)

The Regen 2 industrial furnace is the primary control for the spent acid tank farm vents and provides temperatures in excess of 816°C and destruction of VOCs in excess of 99.99% as demonstrated in the trial burn for the Regen 2 RCRA Boiler and Industrial Furnace (BIF) permit. Section 60.113b(c)(i) of Subpart Kb allows the documentation of the existence of these conditions to be sufficient for the control system to meet the VOC destruction requirement. Trial burn results for Regen 2 can be found in Attachment 1.

Rhodia monitors temperatures in the Regen 2 industrial furnace and will ensure that the average hourly furnace temperatures remains above 815°C (1,500°F) whenever Tanks 48, 49, 56 and 78 are vented to Regen 2. The temperature in the Regen 2 industrial furnace is maintained between 1,800°F to 2,100°F. The design of the Regen 2 industrial furnace is such that residence times in excess of 0.75 seconds are always maintained. The residence time in the Regen 2 industrial furnace is 2 to 4 seconds.

(2) Spent Acid Vapor Combustor (EPN 170)

The Spent Acid Vapor Combustor (SAVC) operates in series after a caustic scrubber that removes SO₂ from the tank vent system. The caustic scrubber and SAVC are the backup control scheme for the spent acid tank farm vent. When Regen 2 furnace is down, the tank vent system is diverted to the scrubber/combustor. The vapor combustor was designed by the manufacturer to achieve as least 95% DRE at 815°C (1,500°F).

A compliance test was conducted at maximum organic loading to the SAVC. The results from this test demonstrate compliance with 60.113b(c)(1)(i) requirements of 95% destruction of volatile organic compounds when the destruction demonstrated exceeded 95%. A copy of the compliance test report can be found in Attachment 3.

Based on the test results and design, the SAVC achieves $\geq 95\%$ DRE at 1522 °F. Following the precedent in 40 CFR Part 63 Subpart G (HON), compliance will be determined on a daily average basis. Firebox temperature in the SAVC will be continuously monitored. If the daily average firebox temperature (including only temperature data obtained when the valve to the SAVC is open) is at least 1522 °F, then compliance is achieved. If this daily average temperature is less than 1522 °F, we will calculate the daily average DRE for the SAVC and Regen 2 furnace in aggregate (a time-weighted average). Compliance is achieved if the daily average DRE is at least 95%.

Thus, we have two options to demonstrate compliance:

1. SAVC daily average temperature (including only temperature data obtained when the valve to the vapor combustor is open) greater than or equal to 1522 °F.
2. Calculated daily average DRE (considering SAVC and Regen furnace in aggregate) greater than or equal to 95%.

Two options for compliance are specified because option 2 requires a manual calculation to be performed. We prefer to avoid this manual calculation where possible. Option 1 provides a “screening” indication of compliance that can be calculated automatically by the process control computer. If compliance is demonstrated via option 1, it is not necessary to perform the calculation in option 2.

The following theoretical example shows how compliance could be demonstrated using option 2 if option 1 was unable to demonstrate compliance:

12:00 am to 11:00 pm - routed to Regen 2 furnace

11:00 pm to 11:30 pm - routed to SAVC, temperature between 1424-1512 °F *

11:30 pm to 12:00 am - routed to SAVC, temperature between 1522-1536 °F

daily average temperature of vapor combustor = 1501 °F

(as calculated by process control computer)

daily average DRE =

$$\frac{(1380 \text{ min})*(99.9999) + (30 \text{ min})*(90.8) + (30 \text{ min})*(99.6)}{1440 \text{ minutes}} = 99.8\%$$

* Destruction and Removal Efficiency conducted on Rhodia Baton Rouge, Louisiana facility’s similar vapor combustor installation. Test results can be found in Attachment 4

Attachment 1

RCRA Trial Burn Test Results Demonstrating Regeneration Unit No. 2 DRE

**RCRA TRIAL BURN AND BIF CERTIFICATION
OF COMPLIANCE TEST REPORT
RHONE-POULENC, INC.
REGENERATION UNIT NUMBER 2
HOUSTON, TEXAS
TWC PERMIT: HW-50095-001
EPA ID NO: TXD 008099079
VOLUME I**

Prepared For:

**RHONE-POULENC, INC.
8615 Manchester Blvd.
Houston, Texas 77012**

Prepared By:

**ROY F. WESTON, INC.
1 Weston Way, West Chester, PA, 19380-1499**

JULY 1997

Work Order No. 05917-033-001

TABLE 1-4

DESTRUCTION AND REMOVAL EFFICIENCY RESULTS - MODE B

RUN #	POHC ¹	SPIKE RATE ² lb/hr	EMISSION RATE ³ lb/hr	DRE ⁴ %
1	MCB	51.59	< 2.03E-05	> 99.99996
2	MCB	51.60	< 2.26E-05	> 99.99996
3	MCB	51.60	< 2.19E-05	> 99.99996
1	CCl ₄	51.59	< 2.28E-05	> 99.99996
2	CCl ₄	51.68	< 2.55E-05	> 99.99995
3	CCl ₄	118.71	< 2.57E-05	> 99.99998

RUN #	POHC ¹	TOTAL POHC FEED RATES ⁵ lb/hr	EMISSION RATE ³ lb/hr	DRE ⁴ %
1	MCB	55.55	< 2.03E-05	> 99.99996
2	MCB	53.41	< 2.26E-05	> 99.99996
3	MCB	53.25	< 2.19E-05	> 99.99996
3	CCl ₄	136.79	< 2.57E-05	> 99.99998

¹ POHCs - MCB - Monochlorobenzene, CCl₄ - Carbon Tetrachloride

² Average spike rate over duration of test period from B3 spiking report.

³ All VOST tube pairs were non-detect, data reported is average of all three tube pairs per run.

⁴ RCRA Permit Limit is 99.99% DRE.

⁵ The POHCs, MCB and CCl₄ were detected in two of the hazardous waste streams and have been added to the spike rate in order to calculate total DRE.

TABLE 2-3

RHONE-POULENC - HOUSTON, TEXAS
PROCESS OPERATING CONDITIONS AND PROPOSED LIMITS

PARAMETER ¹	UNITS	RUN 1A	RUN 2A	RUN 3A	RUN 1B	RUN 2B	RUN 3B	PROPOSED LIMIT
Maximum Hazardous Waste Feed Rate	lb/min	513.93	479.39	478.76	437.32	459.22	439.04	467.94
Maximum Thermal Input	MMBtu/hr	261.24	235.80	242.55	168.9	167.1	166.54	246.53 ²
Maximum Combustion Chamber Temperature	°F	2,117	2,147	2,117	1915	1904	1909	2127 ²
Minimum Combustion Chamber Temperature	°F	2,056	2,125	2,098	1879	1880	1893	1800 ³
Maximum Combustion Chamber Pressure	"H ₂ O	-2.1	-1.8	-1.9	-2.7	-3.6	-2.6	≤0.0 ³
Minimum Combustion Chamber O ₂	%	0.9	1.0	0.5	1.9	2.0	2.2	1.5 (average) ³ 1.0 (instantaneous) ³
Power to ESP	KVA	ON	ON	ON	ON	ON	ON	ON
Minimum Main Gas Blower SO ₂	%	7.5	7.7	8.2	7.3	8.2	7.6	5.5 ³
Maximum Combustion Gas Velocity	ACFM	186,742	181,677	189,993	168,044	169,370	166,698	186,137 ²
Maximum Hourly Rolling Average for CO	ppmv (wet)	119	76	182	134	120	146	NA
Maximum Hourly Rolling Average for CO	ppmv dry @ 7% O ₂	46.5	27.4	80.6	93.1	95.5	92.6	100

1 Maximum or minimum hourly rolling average values from DCS system.

2 Average of Mode A test runs.

3 Proposed limit same as current limit.

Attachment 2

Contained Vapor Combustor EPN 120 Log Sheet

**RHODIA, INC.
HOUSTON PLANT
FLARE LOG SHEET**

Citation: 40 CFR 264.1035(c)(8)

1. TIME REGEN 2 SHUT DOWN: _____

Citation: 40 CFR 264.1035(c)(8)

2. TIME FLARE STARTED: _____

Citation: 40 CFR 264.1035(c)(5)

3. WAS THERE A FLAME FAILURE?

a. _____	YES	_____	NO	_____	TIME	_____	DURATION
b. _____	YES	_____	NO	_____	TIME	_____	DURATION
c. _____	YES	_____	NO	_____	TIME	_____	DURATION
d. _____	YES	_____	NO	_____	TIME	_____	DURATION

4. IF YES, WHAT WAS CAUSE OF FLAME FAILURE?

a. _____
b. _____
c. _____
d. _____

Citation 40 CFR 264.1035(c)(4)(i)

5. DID FLAME TEMPERATURE EVER GO BELOW 1400 F(760 C)? __YES__NO

Citation: 40 CFR 264.1035(c)(8)

6. TIME ABLE TO VENT TO REGEN FURNACE:

Citation: 40 CFR 264.1035(c)(8)

7. TIME FLARE SHUT DOWN:

DATE: _____	WAS FLARE IN SERVICE?:
BY: _____	YES: _____ NO: _____
TIME: _____	

DATE: _____	WAS FLARE IN SERVICE?:
BY: _____	YES: _____ NO: _____
TIME: _____	

Attachment 3

Contained Vapor Combustor EPN 170 Compliance Test Results

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

SECTION 1.0 SUMMARY

Entech Engineering Inc. was retained by Rhodia Inc. to conduct an initial determination of compliance test of the Sulfuric Acid Regeneration Unit 2, Vapor Combustor 2 in Houston, Harris County, Texas. The primary objective of this program is to demonstrate performance of the Vapor Combustor 2 in controlling volatile organic compound (VOC) emissions according to the Texas Commission on Environmental Quality (TCEQ) Standard Permit No. 4802. The secondary objective of the program is to demonstrate initial compliance of the Vapor Combustor 2 in controlling Highly Reactive Volatile Organic Compound (HRVOC) emissions per the TCEQ Regulation V (30 TAC Chapter 115), Subchapter H. The emission performance test program was conducted on February 15 and 16, 2006 and coordinated by Mr. Floyd Dickerson and Mr. Craig Jongsma of Rhodia Inc. The TCEQ Region 12 (Houston) office was notified of the test program and Mr. Thomas Bill and Mr. Joseph Doby of that office were present during testing.

The Vapor Combustor 2 at the Rhodia Inc., Houston plant is an enclosed flare, manufactured by John Zink Company of Tulsa, Oklahoma, to control VOC's during normal tank breathing and railcar depressurizing. The vapor combustor 2 is designated in the permit as emission point number (EPN) 170. Pipeline-quality sweet natural gas is used as supplemental fuel. According to the permit, Vapor Combustor 2 has to conduct stack testing to demonstrate VOC emissions compliance (Special Condition 14). Testing occurred at the inlet of the vapor combustor to determine destruction and removal efficiency (DRE).

The compliance test was conducted during maximum production (loading) rates, which is identified as the combination of the maximum conditions as identified in the MAER as Vapor Combustor 2 - Normal plus Vapor Combustor 2- Standby (maintenance). Those conditions included an outage on Regeneration Unit Number 2 Furnace (EPN 104), barge unloading of spent sulfuric acid into Tank 78 at a rate of 800 gallons per minute, working volume from spent sulfuric acid Tanks 48, 49 and 56, depressurization of six spent sulfuric acid railcars and depressurization of a spent sulfuric acid truck.

The vapor combustor 2 inlet offgas vent line is a 16-inch internal diameter vertical pipe. The upstream and downstream distances from the sampling plane meet the minimum unobstructed requirements of reference method 1. After destroying the emissions in the vapor combustor, the flue gas is vented to the atmosphere via 8-foot nominal internal diameter (ID) stack. The emission point for vapor combustor is located approximately 35 feet above grade.

According to the TCEQ Region 12 (Houston) office, the vapor combustor must demonstrate compliance with Standard Permit 4802 and the permit representation of 98 % destruction and removal efficiency (DRE). This program also determined compliance on highly-reactive volatile organic compound (HRVOC) emissions and determined HRVOC DRE based on ethylene mass emission rates. The initial compliance test comprised of inlet and outlet (stack) sampling for VOC

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and HRVOC testing by Reference Method (RM) 18. The vapor combustor inlet vent line velocity was measured by RM 2. Moisture at the inlet was determined based on the psychrometric condition of the gases.

Due to Rhodia Inc.'s safety guidelines preventing personnel from accessing the vapor combustor stack during operation, Entech personnel used the combined inlet flue gas composition (i.e., vent gas and natural gas) to determine the EPA stoichiometric Fd factor per the Reference Method (RM) 19 (40CFR60 Appendix A) and using the inlet (i.e., vent gas and natural gas) heat rates to determine the stack flue gas flow rates. The calculated stack flue gas flow rates were then used with measured stack concentrations to determine stack mass emission rates.

The mass emission rates at the inlet and stack were used to determine the DRE of the unit. The arithmetic average of the three runs was used to determine emission compliance test results at the maximum achievable operating condition. Process operational data were recorded by plant personnel to correlate the unit operating conditions to emission parameters.

A summary of the emission compliance test results in comparison to the regulatory requirements and permit specifications for the Vapor Combustor 2, EPN 170 are presented in Table 1. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

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SECTION 3.0 RESULTS AND DISCUSSIONS

Entech Engineering conducted an initial determination of compliance test of the Sulfuric Acid Regeneration Unit 2, Vapor Combustor 2, EPN 170 at Rhodia Inc., Houston plant in Houston, Harris County, Texas. Sampling equipment was set up on February 14, 2006. Testing occurred on February 15 and 16, 2006.

For the emission tests, three 64-minute tests were conducted on one Vapor Combustor 2 to measure inlet vent line, natural gas fuel line and stack VOC and HRVOC emissions while operating at the maximum achievable rate. Inlet pollutant and miscellaneous gas compositions along with flow rates were used to calculate by RM 19 the stack flow rate. The inlet and stack mass emission rates were used to calculate destruction and removal efficiency of the unit. Summaries of the emission compliance test results are presented in Tables 2 through 6. At the stack no VOC concentrations were measured by the gas chromatograph except propane in Test ID 1, therefore the method detection limit for all other VOC and HRVOC species analyzed for is used to represent the stack emission concentration and mass emission.

Other pertinent data of the test program is contained in the appendices. The field raw data is contained in Appendix A. Laboratory data and data calculations are presented in Appendices B and C. Instrument specifications, equipment calibrations, process data, resumes, chain of custody, and personnel information are presented in Appendices D through J.

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Table 2.
Rhodia Inc., Houston, Texas
Vapor Combustor 2 (EPN 170)
VOC Emission Performance Test Summary
Houston, Harris County, Texas

Test ID	1	2	3	Average
Date	02/15/06	02/16/06	02/16/06	
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41	

VOC Emission Data

Inlet Waste Gas Line	(lb/hr)	12.891	5.714	4.401	7.669
Fuel Gas Line	(lb/hr)	12.518	12.611	11.909	12.346
Combined Inlet Waste Gas and Fuel Gas Line VOC's	(lb/hr)	25.409	18.325	16.310	20.014
Stack VOC	(lb/hr)	0.067	0.063	0.066	0.065
VOC DRE	(%)	99.74%	99.66%	99.59%	99.7%

HRVOC Emission Data *

Inlet Waste Gas Line Ethylene	(lb/hr)	0.0724	0.2495	0.2124	0.1781
Stack Ethylene	(lb/hr)	0.0024	0.0023	0.0024	0.0024
HRVOC DRE	(%)	96.64%	99.07%	98.85%	98.2%

Stack HRVOC**	(lb/hr)	0.0253	0.0241	0.0255	0.0249
---------------	---------	--------	--------	--------	--------

*Note: Ethylene was the only HRVOC measured by the Gas Chromatograph at the inlet. The gas chromatograph analysis at the stack resulted in no measurable HRVOC, therefore the method detection limit (MDL) for ethylene is used at the stack. The HRVOC DRE (destruction and removal efficiency) was determined based on ethylene mass emission rates.

**Note: The gas chromatograph analysis at the stack resulted in no measurable HRVOC, therefore the method detection limit (MDL) for all HRVOC's is used at the stack.

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Table 3.
Rhodia Inc., Houston, Texas
Vapor Combustor 2 (EPN 170)
VOC Emission Performance Test Summary
Houston, Harris County, Texas

Test ID	1	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41

Inlet Waste Vent Line Parameters

Inlet Waste Gas Flow Rate	(SCFM)	871.99	1241.67	853.25
	(SCM/hr)	1481.69	2109.85	1449.84
Inlet Waste Gas HHV	(Btu/SCF)	5.37	1.68	1.93
	(Btu/lb)	73.00	23.00	26.00

Combined Inlet Waste Vent Gas Line and Fuel Gas Line Parameters

Fuel Gas Flow Rate	(SCFM)	199.15	210.07	193.73
Fuel Gas HHV	(Btu/SCF)	997.81	995.51	995.51
	(Btu/lb)	21919	21902	21902
Fuel Gas Heat Input	(MMBtu/hr)	11.92	12.55	11.57
Inlet Waste Gas Heat Input	(MMBtu/hr)	0.28	0.13	0.10
Total Heat Input	(MMBtu/hr)	12.20	12.67	11.67
Fd Factor	(DSCF/MMBtu)	12273.14	13497.09	12434.92

Stack Parameters

Flue Gas Flow Rate*	(DSCFM)	6248.26	5952.04	6287.47
Oxygen Content	(%)	12.55	10.89	12.86
Carbon Dioxide Content	(%)	3.50	4.25	3.51

* The flue gas flow rates were determined by Reference Method 19 Fd factor.

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Table 4.
Rhodia Inc., Houston, Texas
Vapor Combustor 2 (EPN 170)
Stack Performance Test Summary
Houston, Harris County, Texas

Test ID	1	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41

Stack Gas Parameters

Stack Flow Rate	(SCFM)	6248.26	5952.04	6287.47
	(SCM/hr)	10617.04	10113.70	10683.66
Stack Mol. Wt.	lb/mole	25.870	26.260	25.760
Oxygen Content	(%)	12.55	10.09	12.86
Carbon Dioxide Content	(%)	3.50	4.25	3.51
Nitrogen Content	(%)	82.21	83.92	81.88
Moisture Content	(%)	1.74	1.74	1.74

Stack Volatile Organic Compounds (VOC) Gas Data

Component Name	Molecular Formula	Concentration** ppmv	Mass Rate lb/hr	Concentration** ppmv	Mass Rate lb/hr	Concentration** ppmv	Mass Rate lb/hr
Methane	16.04	0.2770	0.0043	0.0000	0.0000	0.0000	0.0000
Ethane	30.07	0.1300	0.0038	0.1710	0.0048	0.4200	0.0124
* Ethylene	28.05	0.0890	0.0024	0.0890	0.0023	0.0890	0.0024
Propane	44.09	0.1110	0.0048	0.0880	0.0036	0.0880	0.0038
* Propylene	42.08	0.0870	0.0036	0.0870	0.0034	0.0870	0.0036
Isobutane	58.12	0.0710	0.0040	0.0710	0.0038	0.0710	0.0040
n-Butane	58.12	0.0880	0.0050	0.0880	0.0047	0.0880	0.0050
* cis 2-Butene	56.10	0.0500	0.0027	0.0500	0.0026	0.0500	0.0027
* 1-Butene	56.10	0.0900	0.0049	0.0900	0.0047	0.0900	0.0049
* Isobutylene	56.10	0.0910	0.0050	0.0910	0.0047	0.0910	0.0050
* trans 2-Butene	56.10	0.0320	0.0017	0.0320	0.0017	0.0320	0.0018
n-Pentane	72.15	0.0940	0.0056	0.0940	0.0063	0.0940	0.0066
* 1,3-Butadiene	54.09	0.0940	0.0049	0.0940	0.0047	0.0940	0.0050
1-Pentene	70.13	0.0860	0.0059	0.0860	0.0056	0.0860	0.0059
n-Hexane	86.17	0.1000	0.0084	0.1000	0.0080	0.1000	0.0084
1-Hexene	84.16	0.0830	0.0068	0.0830	0.0065	0.0830	0.0068
Total VOC Stack ***		1.1660	0.0667	1.1430	0.0626	1.1430	0.0661
Total HRVOC Stack *		0.5330	0.0253	0.5330	0.0241	0.5330	0.0255

* Note: Total HRVOC includes ethylene, propylene, cis 2-butene, trans 2-butene, 1-butene, isobutylene, and 1,3-butadiene.

** Note: No VOC concentrations were measured by the gas chromatograph except propane in Test ID 1, therefore all other VOC concentrations are presented as Method Detection Limit (MDL) in parts-per-million by volume.

*** Note: Total VOC does not include Methane and Ethane.

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Table 5.
Rhodia Inc., Houston, Texas
Vapor Combustor 2 (EPN 170)
Inlet Waste Vent Line Performance Test Summary
Houston, Harris County, Texas

Test ID	1	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41

Inlet Waste Vent Line Parameters

Duct Temperature	(deg. F)	84.06	82.56	87.06
Vent Gas Velocity	(ft/sec)	10.60	15.05	10.47
Vent Gas Flow Rate	(SCFM)	871.99	1241.67	853.25
	(SCM/hr)	1481.69	2109.85	1449.84
Vent Mol. Wt.	lb/mole	27.847	27.803	27.710
Oxygen Content	(% dry)	3.10	3.54	2.65
Carbon Dioxide Content	(% dry)	0.30	0.00	0.00
Nitrogen Content	(% dry)	92.53	92.69	92.98
Moisture Content	(%)	3.90	3.71	4.30

Inlet Waste Vent Line Volatile Organic Compounds (VOC) Gas Data

Component Name	Molecular Formula	Volume % wet	Mass Rate lb/hr	Volume % wet	Mass Rate lb/hr	Volume % wet	Mass Rate lb/hr
Methane	16.04	0.0003%	0.007	0.0003%	0.009	0.0003%	0.006
Ethane	30.07	0.0001%	0.004	0.0001%	0.006	0.0001%	0.004
Ethylene	28.05	0.0019%	0.072	0.0046%	0.249	0.0057%	0.212
Propane	44.09	0.0518%	3.101	0.0222%	1.893	0.0217%	1.271
Propylene	42.08	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutane	58.12	0.0267%	2.107	0.0038%	0.427	0.0047%	0.363
n-Butane	58.12	0.0921%	7.268	0.0271%	3.045	0.0320%	2.471
cis 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
1-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutylene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
trans 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
n-Pentane	72.15	0.0002%	0.020	0.0001%	0.014	0.0001%	0.010
1,3-Butadiene	54.09	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
1-Pentene	70.13	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
n-Hexane	86.17	0.0001%	0.012	0.0000%	0.000	0.0000%	0.000
1-Hexene	84.16	0.0001%	0.011	0.0000%	0.000	0.0000%	0.000
Unknown as C3**	44.09	0.0050%	0.299	0.0010%	0.085	0.0012%	0.070
Total VOC Vent Gas *	lb/hr		12.891		5.714		4.401

* Note: Total VOC does not include methane and ethane.

** Note: All unspesiated VOC's are presented as propane equivalent.

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Table 6.
Rhodia Inc., Houston, Texas
Vapor Combustor 2 (EPN 170)
Fuel Gas Line Performance Test Summary
Houston, Harris County, Texas

Test ID	1	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41

Fuel Gas Line Parameters

Vent Gas Flow Rate	(SCFM)	199.15	210.07	193.73
	(SCM/hr)	338.40	356.95	329.19
Vent Mol. Wt.	lb/mole	17.220	17.200	17.200
Oxygen Content	(% dry)	0.14	0.21	0.18
Carbon Dioxide Content	(% dry)	1.65	1.51	1.58
Nitrogen Content	(% dry)	0.89	1.06	0.97
Moisture Content	(%)	1.74	1.74	1.74

Fuel Gas Line Volatile Organic Compounds (VOC) Gas Data

Component Name	Molecular Formula	Volume % wet	Mass Rate lb/hr	Volume % wet	Mass Rate lb/hr	Volume % wet	Mass Rate lb/hr
Methane	16.04	92.8420%	461.851	92.8260%	487.084	92.8340%	449.250
Ethane	30.07	1.9800%	18.462	1.9200%	18.883	1.9500%	17.687
Ethylene	28.05	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Propane	44.09	0.4480%	6.126	0.4200%	6.058	0.4340%	5.773
Propylene	42.08	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutane	58.12	0.1060%	1.910	0.1030%	1.958	0.1050%	1.841
n-Butane	58.12	0.0980%	1.766	0.0950%	1.806	0.0970%	1.701
cis 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
1-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutylene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
trans 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
n-Pentane	72.15	0.0270%	0.604	0.0270%	0.637	0.0270%	0.588
1,3-Butadiene	54.09	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isopentane	72.15	0.0490%	1.096	0.0470%	1.109	0.0480%	1.045
n-Hexane	86.17	0.0170%	0.454	0.0160%	0.451	0.0160%	0.416
1-Hexene	84.16	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Unknown as C6	86.17	0.0210%	0.561	0.0210%	0.592	0.0210%	0.546
	lb/hr		12.518		12.611		11.909

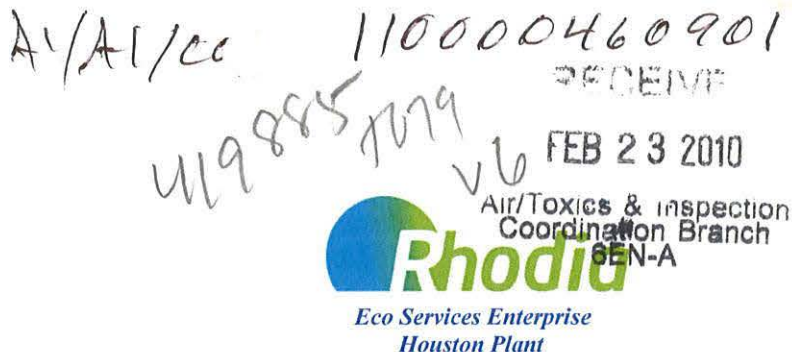
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Table 7.
Rhodia Inc., Houston, Texas
Vapor Combustor 2 (EPN 170)
Process Data Summary
Houston, Harris County, Texas

Test ID	1	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41
Stack Temperature (F)	1522.0	1528.8	1536.2
Natural Gas Flow (SCFM)	199.2	210.1	193.7
Venturi Scrubber (pH)	13.1	12.4	12.4
Packet Column Scrubber (pH)	10.6	10.7	12.1
Pressure Scrubber Venturi Inlet (in WC)	-0.6	-0.4	-0.4
Pressure Scrubber Column Inlet (in WC)	4.3	5.1	5.1
Pressure Vapor Combustor inlet (in WC)	1.5	2.0	1.5

Note: Data presented is average of at least four 15 minute readings. Raw process data is presented in Appendix E.



CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7008 1830 0000 4280 5893)

February 16, 2010

Ms. Becky Weber
Associate Division Director for Air Programs (6PD)
U.S. EPA – Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Benzene Waste Operations NESHAP
Industrial Solid Waste Registration No. 31019
Hazardous Waste Permit No. HW-50095-001
40 CFR Part 61, Subpart FF
EPA ID No. TXD008099079

Dear Ms. Weber:

Enclosed please find a report for the 2009 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 6.9 megagrams for the operating year 2009.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2009.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,



W. F. Dickerson
Environmental Manager

Attachment

CC: Air Section Manager, TCEQ, Region 12, Houston
Arturo Blanco, City of Houston, Bureau of Air Control

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Rhodia Inc.
Houston, Texas
Calendar Year 2009 Report

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40 CFR 61 Subpart FF - Benzene Annual Report

Air/Toxics & Inspection
Coordination Branch

61.357(a)(2)		61.357(a)(3)(i)	61.357(a)(3)(ii)	61.357(a)(3)(iii)	61.357(a)(3)(iv)	61.357(a)(3)(v)	61.357(a)(3)(vi)
Waste Stream	Controlled Benzene Emissions	Water Content of Waste Stream >10%	Waste Stream a Process Wastewater Stream, Product Tank Drawdown, or Landfill Leachate	Annual Waste Quantity (Mg/yr)	Range of Benzene Concentration (ppmw)	Annual Average Flow Weighted Benzene Concentration (ppmw)	Annual Benzene Quantity (Mg/yr)
808006	Y	N	N	5.0	0-10,000	10,000	0.1
9808003	Y	Y	Y	22.9	0-100,000	100,000	2.3
9109003	Y	Y	Y	7.3	0-10	10	0.0
911001	Y	N	N	0.0	60-88	88	0.0
509004	Y	N	N	0.0	100-300	300	0.0
710004	Y	N	N	22.9	0-10,000	10,000	0.2
9104004	Y	N	N	0.0	10-200	200	0.0
908003	Y	N	N	0.6	0-30,000	30,000	0.0
0312002	Y	N	N	75.7	10,000-50,000	50,000	3.8
9612008	Y	Y	Y	0.3	10-10,000	10,000	0.0
809006	Y	N	N	23.7	1,000-20,000	20,000	0.5
905002	Y	N	N	1.2	0-0.5	1	0.0
9405021	Y	Y	Y	1.1	10-2,000	2,000	0.0
TOTAL						6.9	Mg/yr

Y=Yes, N=No Y=Yes, N=No Y=Yes, N=No

Al/Al/co

110000460901

7079 JB



Eco Services Enterprise
Houston Plant

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FEB 24 2010

Air/Toxics & Inspection
Coordination Branch
SEN-A

February 26, 2010

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Mr. John Blevins, Director
Enforcement and Compliance Assistance Division
U.S. EPA Region 6
Mailcode 6EN
1445 Ross Avenue, Dallas, TX 75202

Certified Mail: Return Receipt Requested (7008 1830 0000 4280 5916)

Ms. Susana Hildebrand, Chief Engineer/Deputy Director
Texas Commission on Environmental Quality
MC 168
P.O. Box 13087
Austin, TX 78711-3087

Subject: Initial Notification for 40 CFR Part 63 Subpart VVVVVV
Area Source Standards for Chemical Manufacturing
Permit No. O3049
Rhodia Inc. Houston, Texas Facility – Regeneration Unit No. 2 Sulfuric Acid Plant

Dear Mr. Blevins and Ms. Hildebrand:

Rhodia's Sulfuric Acid Plant at the Houston site is an area source of Hazardous Air Pollutants and is subject to 40 CFR Part 63 subpart VVVVVV National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Chemical Manufacturing. Additional information is provided below.

Section 1. Facility Information

Source category:	All Other Basic Inorganic Chemical Manufacturing
NAICS code(s):	325188
Compliance Date (existing source):	October 29, 2012
Owner/Operator:	Rhodia, Inc. 8 Cedar Brook Drive Cranbury, NJ 08512-7500
Facility/CMPU name:	Houston Site, Regeneration Unit No. 2 Sulfuric Acid Plant

Facility Physical address: 8615 Manchester Street
Houston, TX 77012

Facility Mailing Address: 8615 Manchester Street
Houston, TX 77012

Facility Contact: Floyd Dickerson
Environmental Manager

Telephone number: 713-924-1408

Email address: floyd.dickerson@us.rhodia.com

Section 2. Description of Operation

Brief description of the operation:

The Regeneration Unit No. 2 Sulfuric Acid Plant generates product sulfuric acid. The production of sulfuric acid begins with combustion/oxidation of sulfur to sulfur dioxide. The raw materials and product do not contain HAPs. However, the combustion unit co-fires supplemental waste fuel that contains Table 1 HAPs. This unit is defined as an "Industrial Furnaces" per 40 CFR 260.10 and as a "Boilers" in the CMAS rule (per 40 CFR 63.111). Per EPA's Air Compliance Branch (Marcia Mia), the supplemental waste fuel is an "other material" introduced into the CMPU and, because it directly contacts process fluids in the combustion units, the Regeneration Unit No. 2 Sulfuric Acid Plant is an affected CMPU per the CMAS rule.

Does your facility use, produce or generate a Table 1 Organic HAP?

Yes, Table 1 organic HAPs are present at >0.1% in supplemental waste fuels that are combusted for energy recovery and may also be present in spent materials that are combusted to recover sulfur.

Does your facility use, produce or generate a Table 1 Metal HAP?

Yes, Table 1 metal HAPs are present in supplemental waste fuels that are combusted for energy recovery and spent materials that are combusted to recover sulfur. The Table 1 metal HAP concentration is normally less than 0.1%. Before the compliance date, Rhodia will either implement administrative controls to ensure no Table 1 metal HAPs are present above 0.1% or comply with any applicable metal HAP provisions of the rule.

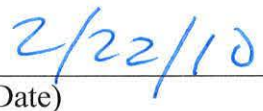
Types of emissions sources at the CMPU:

- Batch Process Vents – the CMPU has no batch vents
- Continuous Process Vents – the CMPU has continuous process vents that discharge to atmosphere or to control device(s), but all are <0.005 weight percent total organic HAP which excludes them from the CMAS definition of continuous process vent per 40 CFR 63.107(d)
- Metal HAP Process Vents – the CMPU has metal HAP process vents
- Halogenated Process Vents – the CMPU processes halogenated organics, but no vents are subject to CMAS halogen controls because there are no “continuous process vents” per CMAS definition and because the CMAS-regulated storage vessel vents contain <0.45 kg/hr of halogen atoms contained in organic compounds at the point of discharge to the control device.
- Storage Vessels – the CMPU has several storage vessels that are subject to the CMAS rule
- Bottoms receivers and/or surge control vessels - the CMPU has no bottoms receivers or surge control vessels
- Wastewater - the CMPU generates wastewater streams, but all are <5 ppmw 40 CFR Part 63 Subpart G Table 9 HAPs which excludes them from the CMAS definition of wastewater
- Transfer Operations – the CMPU has transfer operations, but rarely or never transfers liquids containing Table 1 organic HAPs into railcars and tank trucks
- Equipment (i.e., valves, pumps, compressors, etc) – the CMPU has many items of equipment that are subject to inspections per 63.11495(a)(3)
- Heat Exchange Systems – the CMPU has cooling towers with >8000 gpm flow rate, but they meet one or more exemptions in 40 CFR 63.104(a)

Section 3. Certification

I hereby certify that the information presented herein is correct to the best of my knowledge.


(Signature)


(Date)

William McConnell, Site Manager
(Name/title)

713-924-1401
(Telephone No.)



RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

AI/AI/CO
110000 460901
7079 v6
**Eco Services Enterprise
Houston/Baytown Plants**

RECEIVE
JAN 8 2010
Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail Return Receipt Requested (7008 1830 0000 4280 6173)

January 4, 2010

Compliance Assurance and Enforcement Division (6EN)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: Rhodia Inc.
Houston, Texas Plant
NSPS Kb Semiannual Report – 2nd Half 2009
Permit No. O-01609

To Whom It May Concern:

Per the 40 CFR Part 60 (NSPS) Subpart Kb operating plan for the Houston plant, the following tanks are subject to vapor control, or assumed to be subject to vapor control, per NSPS Subpart Kb.

Tank No.	Description	Contents	Control Device
B-1 B-2	Treatment Services (TS) Tanks	Volatile organic liquids (VOL)	Regeneration Unit No.2 Furnace with TS Vapor Combustor (TSVC) as backup
Tk 48 Tk 49 Tk 53 Tk 56* Tk 78*	Spent Acid (SA) Tanks	Spent sulfuric acid with potential for containing volatile organic liquids	Regeneration Unit No.2 Furnace with Spent Acid Vapor Combustor as backup.

**Available information indicates that tanks 56 and 78 have not been reconstructed or modified since 1984, but are listed for completeness.*

40 CFR 60.7 requires a semiannual report for these tanks.

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JAN 8 2010

Spent Acid Tanks Summary Report

Air/Toxics & Inspection
Coordination Branch
SEN-A

Pollutant	VOC
Reporting period dates:	7/1/2009 to 12/31/2009
Company:	Rhodia Inc. Houston site
Emission Limitation:	25.93 lbs/hr when venting to secondary APVC (vapor combustor)
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Spent Acid Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
a. Startup/shutdown	0 hours
b. Control equipment problems	698.7 hours
c. Process problems	0.0 hours
d. Other known causes	0.0 hours
e. Unknown causes	0.0 hours
Total duration of excess emission	698.7 hours
Total duration of excess emissions	16.1 %

**Rhodia Houston Plant
NSPS Kb Semiannual Report
Excess Emission Summary
1/1/2009 to 6/30/2009 Reporting Period**

Date	Time of Incident	Incident Number	Control Device	Event	Event Duration	total hours	VOCs Emitted (total lbs)	VOCs Emitted (average lbs/hr*)
6/25/2009	3:20 PM	2009-165	EPN 170	Plant-wide power failure due to heavy thunderstorm	53 minutes	0.88333	13.00	14.72
8/12/2009	6:50 PM	2009-212	EPN 170	Power trip due to powerful thunderstorms	1 hour, 17 minutes	1.28333	18.80	14.65
8/19/2009	3:10 PM	2009-218	EPN 170	Power lost due to external power company issue with substation	14 minutes	0.233	5.30	22.75
8/25/2009	3:10 PM	2009-225	EPN 170	Power lost due to external power company issue with substation	17 minutes	0.28333	6.90	24.35
8/31/2009	10:20 AM	2009-230	EPN 170	Power lost due to external power company issue with substation	17 minutes	0.28333	6.90	24.35
9/11/2009	11:38 AM	2009-243	EPN 170	Maintenance required diversion of spent acid tank farm emissions from furnace	2 hours, 45 minutes	2.75	39.80	14.47
9/13/2009	10:00 AM	2009-240	EPN 170	Power lost due to external power company issue with substation	25 minutes	0.41667	6.10	14.64
10/16/2009	12:32 AM	2009-296	EPN 170	Turnaround Emissions from Regen 2. TCEQ notified before and after event. Investigation #785155 pertains to this maintenance event.	692 hours, 37 minutes	692.617	15173.00	21.91

698.7

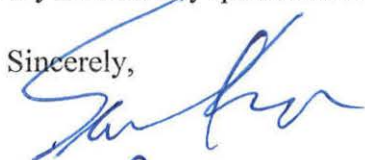
*It is important to note that this is the average emission rate over the entire incident. While the average rate is often less than the permitted rate of 25.93 lbs/hr, one or more hours during the incident may have exceeded the permitted emission rate. Rhodia is conservatively reporting the entire incident duration as excess emissions.

TS Tanks Summary Report

Pollutant	VOC
Reporting period dates:	7/1/2009 to 12/31/2009
Company:	Rhodia, Inc. Houston site
Emission Limitation:	22.22 lbs/hr when venting to TSVC
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Treatment Services Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
f. Startup/shutdown	0 hours
g. Control equipment problems	0.0 hours
h. Process problems	0.0 hours
i. Other known causes	0.0 hours
j. Unknown causes	0 hours
Total duration of excess emission	0.0 hours
Total duration of excess emissions	0.0 %

If you have any questions concerning this matter, please call Samuel E. Keen, PE at (713) 924-1484.

Sincerely,



for
William McConnell
Plant Manager

Attachment

Cc: Executive Director, MC-109
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Air Section Manager
Texas Commission on Environmental Quality
5425 Polk Avenue, Suite H
Houston, TX 77023-1486

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441

AC/AI/CO

110000460901

T87906



RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

Eco Services Enterprise
Houston/Baytown Plants

RECEIVE

JAN 8 2010

Air/Toxics & Inspection
Coordination Branch
SEALA

Certified Mail: Return Receipt Requested (7008 1830 0000 4280 6180)

January 4, 2010

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

RE: Rhodia Inc.
Houston, Texas
Title V Deviation Annual Certification Report
Permit No.: O-01609
Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the annual Title V certification report for the Rhodia Houston, Texas facility which covers the period from December 10, 2008 to December 9, 2009.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

A handwritten signature in black ink, appearing to read "SK", with a long horizontal flourish extending to the right.

Sam Keen
Environmental Engineer

Attachments

cc: Chief, Air Branch
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Shankle
Executive Director
Texas Commission on Environmental Quality
MC 109
P.O. Box 13087
Austin, TX 78711-3087

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
Health and Human Services Department
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

Title 30 Texas Administrative Code § 122.132(e) [30 TAC § 122.132(e)] (relating to "Application and Required Information") and 30 TAC § 122.165 (relating to "Certification by Responsible Official") require that a Responsible Official (RO), or appropriate designee, shall certify all documents submitted to the Texas Natural Resource Conservation Commission (TNRCC) as consideration for, or in support of, a federal operating permit (FOP), or that are required by 30 TAC Chapter 122 or by operating permit condition(s). This includes application materials, as well as, any associated federally applicable requirements, such as compliance monitoring, record keeping, testing, or reporting submittals. The certification shall state that, based upon the information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete, and must be signed by the RO, Duly Authorized Representative (DAR), Designated Representative (DR), or Alternate Designated Representative (ADR). (The DR and ADR apply to Title IV acid rain sources only. The DR or ADR shall certify application information for sites with one or more units subject to the Acid Rain Program, and shall certify application information and reports as an RO.) This Form OP-CRO1 satisfies these certification requirements in a manner consistent with 30 TAC § 122.165.

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications must be certified prior to public notice of the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving a authorization to operate under a GOP.

I. IDENTIFYING INFORMATION			
A. Account No.: HG-0697-O		B. Permit No.: O-01609	
C. Project No.:			
D. Area Name: Houston Plant			
E. Company Name: Rhodia Inc.			
II. CERTIFICATION TYPE (Place an "X" in the appropriate box[es])			
A. Responsible Official:			
B. Duly Authorized Representative:		X	
C. Designated Representative (Title IV acid rain sources only):			
D. Alternate Designated Representative (Title IV acid rain sources only):			
III. SUBMITTAL TYPE (Place an "X" in the appropriate box) (Only <u>one</u> response can be accepted per form)			
<input type="checkbox"/> SOP/TOP Initial Permit Application		<input type="checkbox"/> Permit Revision/Renewal/Reopening	
<input type="checkbox"/> GOP Initial Permit Application		<input type="checkbox"/> Update to Permit Application*	
<input checked="" type="checkbox"/> Other: Title V annual certificat			
IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS			
This certification does not extend to information which is designated by the TNRCC as information for reference only.			
I, <u>William McConnell</u> , certify that I am the <u>DAR</u> and that, based on information			
(Name printed or typed) (RO, DAR, DR, and/or ADR)			
and belief formed after reasonable inquiry, the statements and information dated the following, or herein attached, are true, accurate, and complete:			
<u>01/04/2010</u> _____ _____ _____ _____ _____ _____			
Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*			
Dates 2-8 should only be completed if the box for "Update to Permit Application" is marked above, and this form is being used to certify updates that are, as yet, uncertified. If this is an "Update to Permit Application," it must be submitted before, or at the time of, the public notice certification.			
Signature: <u>William McConnell</u>		Signature Date: <u>1/4/10</u>	
Title: <u>Plant Manager</u>			

TCEQ Core Data Form

TCEQ Use Only

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

SECTION I: General Information

1. Reason for Submission *Example: new wastewater permit; IHW registration; change in customer information; etc.*

Annual Title V Certification Report

2. Attachments Describe Any Attachments: (ex: Title V Application, Waste Transporter Application, etc.)

☒ YES ☐ NO Form OP-CRO1, Form TNRCC-10490

3. Customer Reference Number-if issued

CN 600125330 (9 digits)

4. Regulated Entity Reference Number-if issued

RN 100220581 (9 digits)

SECTION II: Customer Information

5. Customer Role (Proposed or Actual) -- As It Relates to the Regulated Entity Listed on This Form

Please check one of the following: ☐ Owner ☐ Operator ☒ Owner and Operator

☐ Occupational Licensee ☐ Volunteer Cleanup Applicant ☐ Other

TCEQ Use Only ☐ Superfund ☐ PST ☐ Respondent

6. General Customer Information

☐ New Customer ☐ Change to Customer Information

☐ Change in Regulated Entity Ownership ☒ No Change *

*If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.

7. Type of Customer:

☐ Individual ☐ Sole Proprietorship - D.B.A.

☐ Partnership ☒ Corporation ☐ Federal Government

☐ State Government ☐ County Government ☐ City Government

☐ Other Government ☐ Other:

8. Customer Name (If an individual, please print last name first) If new name, enter previous name:

Rhodia Inc.

9. Mailing Address: 259 Prospect Plains Road

City State ZIP ZIP + 4
Cranbury NJ 08512 7500

10. Country Mailing Information if outside USA

11. E-Mail Address if applicable

12. Telephone Number

(609) 860-4000

13. Extension or Code

14. Fax Number if applicable

(609) 409-2485

15. Federal Tax ID (9 digits)

223539954

16. State Franchise Tax ID Number if applicable

11937546

17. DUNS Number if applicable (9 digits)

2959810

18. Number of Employees

☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher

19. Independently Owned and Operated?

☒ Yes ☐ No

SECTION III: Regulated Entity Information

20. General Regulated Entity Information

☐ New Regulated Entity ☐ Change to Regulated Entity Information ☒ No Change*

*If "No Change" and Section I is complete, skip to Section IV - Preparer Information.

Press the Tab Key to continue to page 2.

21. Regulated Entity Name <i>(If an individual, please print last name first)</i>					
Rhodia Inc.					
22. Street Address (No PO Boxes)		8615 Manchester Street			
City		State	ZIP	ZIP + 4	
Houston		TX	77012		
23. Mailing Address		8615 Manchester Street			
City		State	ZIP	ZIP + 4	
Houston		TX	77012		
24. E-Mail Address:					
25. Telephone Number		26. Extension or Code		27. Fax Number <i>if applicable</i>	
(713) 928-3411				(713) 928-3431	
28. Primary SIC Code (4 digits)	29. Secondary SIC Code (4 digits)	30. Primary NAICS Code (5 or 6 digits)		31. Secondary NAICS Code (5 or 6 digits)	
2819		325188			
32. What is the Primary Business of this entity? <i>(Please do not repeat the SIC or NAICS description)</i>					
Manufacture of sulfuric acid, liquid sulfur dioxide and commercial hazardous waste incineration					
<i>Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.</i>					
33. County	Harris				
34. Description of Physical Location					
Facility is located on the south bank of the Houston Ship Channel, west of Interstate 610 East Loop					
35. Nearest City		State	Nearest Zip		
Houston		TX	77012		
36. Latitude (N)			37. Longitude (W)		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	43	20	95	16	20
38. TCEQ Programs In Which This Regulated Entity Participates <i>Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "Unknown". If you know a permit or registration # for this entity, please write it below the program.</i>					
<input type="checkbox"/>	Animal Feeding Operation	<input type="checkbox"/>	Petroleum Storage Tank	<input type="checkbox"/>	Water Rights
<input checked="" type="checkbox"/>	Title V - Air	<input checked="" type="checkbox"/>	Wastewater Permit	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	Industrial & Hazardous Waste	<input type="checkbox"/>	Water Districts	<input type="checkbox"/>	
<input type="checkbox"/>	Municipal Solid Waste	<input type="checkbox"/>	Water Utilities	<input type="checkbox"/>	Unknown
<input checked="" type="checkbox"/>	New Source Review - Air	<input type="checkbox"/>	Licensing - TYPE(s)	<input type="checkbox"/>	
Section IV: Preparer Information					
39. Name			40. Title		
Samuel E. Keen, PE			Environmental Engineer		
41. Telephone Number		42. Extension or Code		43. Fax Number <i>if applicable</i>	
(713) 924-1484				(713) 921-0374	
44. E-mail Address:		sam.keen@us.rhodia.com			

Texas Natural Resource Conservation Commission
Texas Federal Operating Permit Form
PCC
Permit Compliance Certification
(Part 1)

RECEIVED
JAN 8 2010
Air/Toxics & Inspection
Coordination Branch
RNL-A

Company Name	Rhodia Inc.	Account No.	HG-0697-C
Area Name	Houston Plant	Op Permit No.	O-01609
Certification Period Began on	12/10/2008	And Ended on	12/09/2009
		Report Submittal Date	01/04/2010

I. Certification of Continuous Compliance with Permit Terms and Conditions	Response	
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the company in continuous compliance with all the terms and conditions of the permit over the Certification Period?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

II. Summary of Deviations	Response	
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
<p>A. Were there any deviations from any terms or conditions of the permit during the Certification Period that have <i>previously</i> been reported to the agency?</p> <p>If the answer to this question is 'Yes', please complete Part 2, and attach Part 2 to this page.</p> <p><i>Important Note:</i> If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use Part 3 to provide that information.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?</p> <p>If the answer to this question is 'Yes', please include the relevant reports along with this page.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

NOTE: The Responsible Official must certify the information reported in conjunction with this form in accordance with 30 TAC 122.143(16) utilizing form OP-CRO1 (Certification by Responsible Official). Therefore, complete an OP-CRO1 and attach it to this Compliance Certification package and submit the package to the appropriate TNRCC Regional Office.

Texas Natural Resource Conservation Commission
Texas Federal Operating Permit Form
PCC
Permit Compliance Certification
(Part 2)

Company Name	Rhodia Inc.		Account No.	HG-0697-O
Area Name	Houston Plant		Op Permit No.	O-01609
Certification Period Began on	12/10/2008	And Ended on	12/09/2009	Report Submittal Date 01/04/2010

Identification of Deviation Reports Submitted During the Certification Period (Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)			
Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
07/08/2009	Semi annual deviation report for Houston Plant	Houston TCEQ	YES
01/04/2010	Semi annual deviation report for Houston Plant	Houston TCEQ	YES

Texas Operating Permit Deviation Summary Report Form
Form PCC (Part 3)

Company Name	Rhodia Inc.		Account No.	HG-0697-O
Area Name	Houston Plant		Op Permit No.	O-01609
Certification Period Began on	12/10/2008	And Ended on	12/09/2009	Report Submittal Date
				01/04/2010

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		Total Number of Deviations (Rq'd)
Unit ID	Group ID						Citation	Frequency	
PRO-Regen 2		4802 SC1	SO2	30 TAC 101.201	Standard	Reg2-0002			46
S1 & S2		56566, SC 4		30 TAC 112.31	Permit Requirement				2
PRO-Unit8		19282, SC1	SO2	30 TAC 101.201	Standard				16
120		4802, SC1	VOC	30 TAC 115.122(a)	Authorized Emission	R5112-0001A			19
170		4802, SC7(a)	VOC	30 TAC 101.201	Authorized Emission	Reg2-0001			1
170		4802	VOC	40 CFR 60, Kb	Authorized Emission	Reg2-0001			12
Tank 48		4802, SC 1	VOC	30 TAC 101.201	Standard	R5112-0002			18
Tank 49		4802, SC 1	VOC	30 TAC 101.201	Standard	R5112-0002			18
Tank 53		4802, SC 1	VOC	30 TAC 101.201	Standard	R5112-0002			18
Tank 56		4802, SC 1	VOC	30 TAC 101.201	Standard	R5112-0002			18
Tank 78		4802, SC 1	VOC	30 TAC 101.201	Standard	R5112-0002			18
Tank 48		4802, SC 1	SO2	30 TAC 101.201	Standards	R5112-0002			18

Texas Operating Permit Deviation Summary Report Form
Form PCC (Part 3)

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Houston Plant				Op Permit No.		O-01609	
Certification Period Began on		12/10/2008		And Ended on		12/09/2009		Report Submittal Date	
								01/04/2010	

Tank 49		4802, SC 1	SO2	30 TAC 101.201	Standard	R5112-0002			18
Tank 53		4802, SC 1	SO2	30 TAC 101.201	Standard	R5112-0002			18
Tank 56		4802, SC 1	SO2	30 TAC 101.201	Standard	R5112-0002			18
Tank 78		4802, SC 1	SO2	30 TAC 101.201	standard	R5112-0002			18
EPN 170		4802, SC 11	VOC	30 TAC 115.122(a)	Authorized Emis	R5112-0001A			18
		O-01609		30 TAC 122	Standard	Reg2-0001			2
101		Permit 19282	SO2		Monitoring and	Reg2-0001			2
101		19282, SC 1	PM	30 TAC 115.122(a)	Authorized Emis	Reg2-0001			1
		4802, SC 4		40 CFR 61.342(f)	Monitoring	Reg2-0001			40
104		4802 SC 4		40 CFR 61.345(e)(3)	Monitoring	Reg2-0001			40
PRO-Regen2		4802	CO	40 CFR 266, App IX	Monitoring	Reg2-0001			1
		56566, SC 7		30 TAC 101.1(100)	Control Required	Reg2-0001			6
120		4802	VOC	40 CFR 60, Kb	Reporting	Reg2-0001			1
			VOC	40 CFR 63.148(f)(2)	Report	Reg2-0001			12
120		4802, SC 7	VOC		Standards	Reg2-0001			46
				30 TAC 122	Reporting	Reg2-0001			258



RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

*Eco Services Enterprise
Houston/Baytown Plants*

CERTIFIED MAIL; RETURN RECEIPT REQUESTED: (7008 1830 0000 4280 6203)

January 18, 2010

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Street, Suite H
Houston, Texas 77023-1486

Subject: Rhodia Inc. (CN600125330)
Houston Plant (RN100220581)
Consent Decree (Civil Action No. 2:07CV134 WL)
Air Permit 19282 and PSD-TX-1081
Excess Emission Report for SO₂ per 40 CFR 60.7(c)-(d)
Data Assessment Report for SO₂ and O₂ CEMs per 40 CFR Part 60, Appendix F

Dear Sir or Madam:

In accordance with the Consent Decree referenced above, the Rhodia Inc. (Rhodia) Houston No. 8 became subject to 40 CFR Part 60 Subpart H, Standards of Performance for Sulfuric Acid Plants on November 19, 2008. Further, the Consent Decree specifies a SO₂ emission standard that is more stringent than Subpart H and also incorporates an EPA-approved Alternative Monitoring Plan (AMP). As such, the semiannual excess emission report required by 40 CFR 60.7(c)-(d) and the semiannual data assessment report (DAR) required by 40 CFR Part 60 Appendix F, Procedure 1, Section 7 will address compliance with respect to the more stringent CD requirements and the AMP. These reports are attached for the July to December 2009 semiannual reporting period.

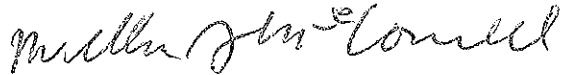
The relevant SO₂ standards required by the CD and AMP are as follows:

- Per CD paragraph 11.b.i, emissions of SO₂ are not to exceed a long term limit of 1.70 pounds per ton of 100% sulfuric acid produced (averaged over all operating hours in a rolling 365-day period). Compliance is to be demonstrated by July 1, 2010.
- Per CD paragraph 11.b.ii, emissions of SO₂ are not to exceed a short term limit of 3.00 pounds per ton of 100% sulfuric acid produced (averaged over each rolling 3-hour period). This limit does not apply during periods of startup, shutdown, and malfunction.

As discussed in the AMP, Rhodia uses dual analyzers to determine the conversion factor for converting monitoring data (ppm SO₂ and % O₂) into units of the standard (lbs/ton). This exceeds the "three times daily" minimum discussed in 40 CFR 60.84(b).

If you have any questions or require additional information, please contact Samuel E. Keen, PE at 713-924-1484.

Sincerely,

A handwritten signature in cursive script, appearing to read "William McConnell".

William McConnell
Plant Manager

Attachment(s)

cc: Mr. Badruddin (Bud) Karachiwala, Director, Pollution Control Department, Harris
County Public Health and Environmental Services
Mr. Arturo Blanco, Bureau Chief of Air Quality Control, Health and Human Services
Department, City of Houston
EPA Region 6, New Source Review Program, 1445 Ross Avenue, Dallas, TX 75202-2733

NSPS Excess Emissions Report
July – December, 2009

General Information:

Pollutant:	Sulfur Dioxide (SO ₂)
Reporting period dates:	July 1 – December 31, 2009
Emission Limitation:	3.00 lbs/ton short-term, 1.70 lbs/ton long-term
Address:	8615 Manchester Street, Houston, Texas 77012
Process Unit Description (Source Unit No):	No. 8 Sulfuric Acid Unit
Monitor Manufacturer and Model No (Stack SO ₂):	Ametek Model 920
Date of Latest CEMS Certification or Audit (Stack):	10/14/09
CEMS span values per the AMP (Stack) ⁽¹⁾ :	Dual range: Normal: 0 – 500 ppm SO ₂ SSM: 0 – 3,600 ppm SO ₂

Notes:

⁽¹⁾ Refer to EPA approved Alternative Monitoring Plan for the Houston No. 8 Unit.

NSPS Excess Emissions Report
July – December, 2009

Emission data summary – Long-Term Limit (Effective November 18, 2009)

1. Duration of excess emissions (as defined per CD and AMP) in reporting period due to:	
a. Startup/shutdown	0 hours
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total duration of excess emission	0 hours
3. Total duration of excess emissions as percent of total source operating time	0%

Emission data summary – Short-Term Limit

1. Duration of excess emissions (as defined per CD and AMP) in reporting period due to:	
a. Startup/shutdown	NA – limit does not apply during startup/shutdown
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total duration of excess emission	0 hours
3. Total duration of excess emissions as percent of total source operating time	0%

**NSPS Excess Emissions Report
July – December, 2009**

Stack SO₂ Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	10 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	99.5 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	109.5 hours ⁽¹⁾
3. Total CEMS Downtime as percent of total source operating time	2.4 %

Stack O₂ Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	10 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	95.5 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	109.5 hours ⁽¹⁾
3. Total CEMS Downtime as percent of total source operating time	2.4 %

- ⁽¹⁾ The Houston #8 Unit followed procedures specified in an EPA approved Alternative Monitoring Plan (AMP) for CEMS malfunctions. In accordance with the AMP, during CEMS malfunctions lasting more than 24 continuous hours Rhodia generally:
- Conducted sampling with hand-held monitors when the stack SO₂ and O₂ CEMS malfunctioned.

**NSPS Excess Emissions Report
July – December, 2008**

Data Assessment Reports (DARs) per 40 CFR Part 60 Appendix F

Analyzer/ Pollutant/ Units	Reporting Period	Accuracy Assessment			Any out-of- control periods for Calibration Drift Assessment? **
		Type (RATA, CGA, or RAA)	Any Out-of- Control Periods? +	Notes	
Stack SO ₂ , ppm	3Q09, 4Q09	CGA	No		No
Stack O ₂ , %	3Q09, 4Q09	CGA	No		No

Describe any changes since last quarter in CEMS, process or controls:

There have been no changes in the CEMS, process, or controls since the unit was started on November 19, 2008 .

***** Certification Statement for Summary Report per 40 CFR 60.7(d)*****

I certify that the information contained in this report is true, accurate, and complete.

William McConnell
Name of Responsible Official

William J. McConnell
Signature

Plant Manager

Title

1/18/2010

Date

QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: #8 STACK SO₂

Date: 7/16/09 Time: 15:00

Serial Number: VE-920-8700-2

Technician: Steven Albin

Signature: [Signature]

EPA DATE	04-09-11		04-09-11			
Cylinder ID number	ALM649345		ALM648359			
Date of Certification	04-09-2009		03-31-2009			
Type of certification (e.g. EPA Protocol 1 or CRM).	EPA Protocol 126 ppm SO ₂		EPA Protocol 272 ppm SO ₂			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C _a (ppm)	126 ppm	272 ppm	126 ppm	272 ppm	126 ppm	272 ppm
CEM Response value C _m (ppm)	124 ppm	276 ppm	123 ppm	269 ppm	124 ppm	269 ppm
Accuracy A (% or ppm)	1.587%	0.735%	2.381%	1.163%	1.587%	1.163%

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



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RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/329240561A INC

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2466-002

PO#4500699213

9810 BAY AREA BLVD

8615 MANCHESTER

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: Apr2009 Exp. Date: 9Apr2011

Cylinder Pressure***: 1912 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	13.6 %	+/- 1%	
SULFUR DIOXIDE *	272 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4 PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
SERVOMEX/MODEL 244A/701/716	23Mar2009	PARAMAGNETIC
FTIR/000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)
First Triad Analysis
OXYGEN
Date: 08Apr2009 onse Unit: VOLTS
Z1=0.000001=0.99000T1=0.57210
R2=0.990002=0.00000T2=0.57170
Z3=0.000003=0.57140R3=0.98950
Avg. Concentration: %
Concentration=A+Bx+Cx2+Dx3+Ex4
r=0.9999978
Constants: A=-0.00703813
B=23.71576885
D= E=
SULFUR DIOXIDE *
Date: 02Apr2009 onse Unit: PPM
Z1=-0.17978=255.85031=273.1567
R2=255.9913=0.38507T2=274.0137
Z3=0.388753=274.30733=256.2128
Avg. Concentration: PPM
Date: 09Apr2009 onse Unit: PPM
Z1=-0.64785=255.2667=273.4320
R2=255.3414=-0.17780=273.9350
Z3=0.046553=274.0129=255.5704
Avg. Concentration: PPM
Concentration=A+Bx+Cx2+Dx3+Ex4
r=9.99988E-1
Constants: A=0.00000E+0
B=1.00080E+0=3.00000E-6
D=0.00000E+0=0.00000E+0

Special Notes: LOT # PAS00063

APPROVED BY:

Peter Brandon

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RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2334-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM048359 Certification Date: Mar2009 Exp. Date: 1Mar2011

Cylinder Pressure***: 1950 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY*	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	23Mar2009	FTIR
FTIR//000929060	11Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis Second Triad Analysis Calibration Curve

OXYGEN

Date: 25Mar2009 onse Unit: VOLLT

Z1=0.000001=0.99000T1=0.22180

R2=0.989702=0.00070T2=0.22100

Z3=0.000803=0.22070R3=0.98900

Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=.9999978

Constants: A=-.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.00023=254.19041=124.6734

R2=254.2501=0.15346T2=125.0360

Z3=0.258713=125.31913=254.2770

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.03914=254.1434=125.7700

R2=254.4486=0.084472=126.0405

Z3=0.170743=126.1121=254.6616

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=.99995E-1

Constants: A=0.00000E+0

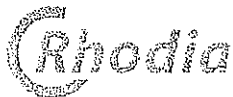
B=9.97420E-1=0.00000E+0

D=0.00000E+0=0.00000E+0

Special Notes: PAS00021

APPROVED BY:

Ramien JR



Eco Services - Houston

Quarterly Cylinder Gas Audit Checklist Stack SO₂ Analyzer

Unit Number (Circle One)

2

8

Date: 7/16/19 Time: 13:00

Technician: Steven Alchir / Felipe Contreras

Serial Number: VE-920-8700-2

Signature: [Signature]

EXP. Date 3/31/12

3/31/12

Cylinder ID number	ALM49888		ALM456870			
Date of Certification	3-31-2009		3-31-2009			
Type of certification (e.g. EPA Protocol 1 or CRM).	921 PPM SO ₂ EPA-1		2000 PPM SO ₂ EPA-1			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C _a (ppm)	921 ppm	2000 ppm	921 ppm	2000 ppm	921 ppm	2000 ppm
CEM Response value C _m (ppm)	913 ppm	1985 ppm	914 ppm	1988 ppm	912 ppm	1987 ppm
Accuracy A (% or ppm)	0.86%	0.75%	0.76%	0.66%	0.90%	0.65%

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



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RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32924643IA

AIR LIQUIDE AMERICA SPECIALTY GAS Project No.: 2341-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM049888 Certification Date: Mar2009 Exp. Date: 1Mar2012

Cylinder Pressure***: 1968 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
SULFUR DIOXIDE *	921 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 1662	15May2010	KAL003254	975.0PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)
First Triad Analysis
Second Triad Analysis
Calibration Curve

SULFUR DIOXIDE *

Date: 24Mar2009	Unit: PPM	Date: 31Mar2009	Unit: PPM	Concentration=A+Bx+Cx2+Dx3+Ex4
Z1=-0.21684=975.66891=921.6842		Z1=-0.01294=976.8492=923.0907		r=9.99988E-1
R2=976.8102=-0.119112=921.6935		R2=977.8269=0.272432=923.4876		Constants: A=0.00000E+0
Z3=0.305253=922.84413=977.0351		Z3=0.506993=923.6709=978.0656		B=1.00080E+0=3.00000E-6
Avg. Concentration: PPM		Avg. Concentration: PPM		D=0.00000E+0=0.00000E+0

Special Notes: DOC# PAS00013

APPROVED BY:

Ramien JR

Page 1 of 1



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RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32924771IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.:2342-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1, September, 1997.

Cylinder Number: ALM056870 Certification Date:Mar2009 Exp. Date:1Mar2012

Cylinder Pressure***: 1961 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
SULFUR DIOXIDE *	2,000 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NRM 1664	02Oct2011	ALM059631	2402.PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)
First Triad Analysis
Second Triad Analysis
Calibration Curve

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.09484=2383.3091=1982.431

R2=2384.241=0.52271T2=1983.385

Z3=0.959453=1984.8833=2385.906

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.10409=2384.951=1985.128

R2=2386.811=0.440912=1986.040

Z3=0.794043=1986.489=2387.704

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99988E-1

Constants: A=0.00000E+0

B=1.00080E+0=3.00000E-6

D=0.00000E+0=0.00000E+0

ecial Notes: DOC# PAS00014

PPROVED BY:

Ramien JR

Page 1 of 1

QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: AFSTACK O₂

Date: 7/16/09 Time: 15:00
 Serial Number: VE-920-8700-2

Technician: Steven Alkhin
 Signature: [Signature]

<u>Exp. Date</u>	<u>04-09-11</u>		<u>03-31-11</u>			
Cylinder ID number	<u>ALMO49305</u>		<u>ALMO48359</u>			
Date of Certification	<u>04-09-2009</u>		<u>03-31-2009</u>			
Type of certification (e.g. EPA Protocol 1 or CRM).	<u>EPA-1</u>		<u>EPA-1</u>			
	<u>13.6% O₂</u>		<u>5.25% O₂</u>			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C_a (ppm)	<u>5.25%</u>	<u>13.6%</u>	<u>5.25%</u>	<u>13.6%</u>	<u>5.25%</u>	<u>13.6%</u>
CEM Response value C_m (ppm)	<u>5.28%</u>	<u>13.7%</u>	<u>5.25%</u>	<u>13.8%</u>	<u>5.28%</u>	<u>13.8%</u>
Accuracy A (% or ppm)	<u>0.03%</u>	<u>0.10%</u>	<u>0.0%</u>	<u>0.20%</u>	<u>0.03%</u>	<u>0.2%</u>

where $A = \frac{(C_m - C_a)}{C_a} \times 100$

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/329240561A INC

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2466-002

PO#4500699213

9810 BAY AREA BLVD

8615 MANCHESTER

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: Apr2009 Exp. Date: 9Apr2011

Cylinder Pressure***: 1912 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	13.6 %	+/- 1%	
SULFUR DIOXIDE *	272 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
SERVOMEX/MODEL 244A/701/716	23Mar2009	PARAMAGNETIC
FTIR/000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis Second Triad Analysis Calibration Curve

OXYGEN

Date: 08Apr2009 onse Unit: VOLTS

Z1=0.000001=0.99000T1=0.57210

R2=0.990002=0.00000T2=0.57170

Z3=0.000003=0.57140R3=0.98950

Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=0.9999978

Constants: A=-0.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 02Apr2009 onse Unit: PPM

Z1=-0.17978=255.85031=273.1567

R2=255.9913=0.38507T2=274.0137

Z3=0.388753=274.30733=256.2128

Avg. Concentration: PPM

Date: 09Apr2009 onse Unit: PPM

Z1=-0.64785=255.2667=273.4320

R2=255.3414=-0.17780=273.9350

Z3=0.046553=274.0129=255.5704

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99988E-1

Constants: A=0.00000E+0

B=1.00080E+0=3.00000E-6

D=0.00000E+0=0.00000E+0

Special Notes: LOT # PAS00063

APPROVED BY:

Peter Brandon



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.:2334-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM048359 Certification Date:Mar2009 Exp. Date:1Mar2011

Cylinder Pressure***: 1950 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	23Mar2009	FTIR
FTIR//000929060	11Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis	Second Triad Analysis	Calibration Curve
----------------------	-----------------------	-------------------

OXYGEN

Date: 25Mar2009 onse Unit: VOLLT
 Z1=0.000001=0.99000T1=0.22180
 R2=0.989702=0.00070T2=0.22100
 Z3=0.000803=0.22070R3=0.98900
 Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4
 r=.9999978
 Constants: A=-.00703813
 B=23.71576885
 D= E=

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM Date: 31Mar2009 onse Unit: PPM
 Z1=-0.00023=254.19041=124.6734 Z1=-0.03914=254.1434=125.7700
 R2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405
 Z3=0.258713=125.31913=254.2770 Z3=0.170743=126.1121=254.6616
 Avg. Concentration: PPM Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4
 r=9.99995E-1
 Constants: A=0.00000E+0
 B=9.97420E-1=0.00000E+0
 D=0.00000E+0=0.00000E+0

Special Notes: PAS00021

APPROVED BY:

Ramien JR

Page 1 of 1

QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: Yokogawa #8 Flack O₂

Date: 7/24/09 Time: 11:00AM

Serial Number: U1J602504

Technician: Steven Alkhin

Signature: [Signature]

Exp. date	03-31-11		04-09-11			
Cylinder ID number	ALM048359		ALM049305			
Date of Certification	03-31-09		04-09-09			
Type of certification (e.g. EPA Protocol 1 or CRM).	EPA Protocol 1 5.25% O ₂		EPA Protocol 1 13.6% O ₂			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C _a (ppm)	5.25%	13.6%	5.25%	13.6%	5.25%	13.6%
CEM Response value C _m (ppm)	5.31%	13.8%	5.30%	13.8%	5.31%	13.8%
Accuracy A (% or ppm)	0.06%	0.20%	0.05%	0.20%	0.06%	0.20%

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2334-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM048359 Certification Date: Mar2009 Exp. Date: 1Mar2011

Cylinder Pressure***: 1950 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4 PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	23Mar2009	FTIR
FTIR//000929060	11Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 25Mar2009 onse Unit: VOLLT

Z1=0.000001=0.99000T1=0.22180

R2=0.989702=0.00070T2=0.22100

Z3=0.000803=0.22070R3=0.98900

Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=.9999978

Constants: A=-.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.00023=254.19041=124.6734

R2=254.2501=0.15346T2=125.0360

Z3=0.258713=125.31913=254.2770

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.03914=254.1434=125.7700

R2=254.4486=0.084472=126.0405

Z3=0.170743=126.1121=254.6616

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99995E-1

Constants: A=0.00000E+0

B=9.97420E-1=0.00000E+0

D=0.00000E+0=0.00000E+0

Special Notes: PAS00021

APPROVED BY:

Ramien JR

Page 1 of 1



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/32924056IA INC

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2466-002

PO#4500699213

9810 BAY AREA BLVD

8615 MANCHESTER

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: Apr2009 Exp. Date: 9Apr2011

Cylinder Pressure***: 1912 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	13.6 %	+/- 1%	
SULFUR DIOXIDE *	272 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
SERVOMEX/MODEL 244A/701/716	23Mar2009	PARAMAGNETIC
FTIR//000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis	Second Triad Analysis	Calibration Curve
----------------------	-----------------------	-------------------

OXYGEN

Date: 08Apr2009 onse Unit: VOLTS

Z1=0.000001=0.99000T1=0.57210

R2=0.990002=0.00000T2=0.57170

Z3=0.000003=0.57140R3=0.98950

Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=0.9999978

Constants: A=-0.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 02Apr2009 onse Unit: PPM

Z1=-0.17978=255.85031=273.1567

R2=255.9913=0.38507T2=274.0137

Z3=0.388753=274.30733=256.2128

Avg. Concentration: PPM

Date: 09Apr2009 onse Unit: PPM

Z1=-0.64785=255.2667=273.4320

R2=255.3414=-0.17780=273.9350

Z3=0.046553=274.0129=255.5704

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99988E-1

Constants: A=0.00000E+0

B=1.00080E+0=3.00000E-6

D=0.00000E+0=0.00000E+0

Special Notes: LOT # PAS00063

APPROVED BY:

Peter Brandon

Page 1 of 1



Eco Services - Houston

Quarterly Cylinder Gas Audit Checklist Stack SO₂ Analyzer

Unit Number (Circle One):

2

(8)

Date: 10/14/09 Time: 2:10 pm

Technician: F. P. P. P.

Serial Number: VE-920-8760-12

Signature: R. P. P.

Cylinder ID number	ALM112359		ALM149305			
Date of Certification	4/12/09		4/12/09			
Type of certification (e.g. EPA Protocol 1 or CRM).	Rata Class Dual Analyzed Cal. 126 ppm		Rata Class Dual Analyzed Cal. 272 ppm			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C_a (ppm)	126	272	126 272	272	126	272
CEM Response value C_m (ppm)	127	269	124	266	123	266
Accuracy A (% or ppm)	0.794%	1.103%	1.584%	2.447%	2.386%	2.360%

where $A = \frac{(C_m - C_a)}{C_a} \times 100$

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2334-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1, September, 1997.

Cylinder Number: ALM048359 Certification Date: Mar2009 Exp. Date: 1Mar2011

Cylinder Pressure***: 1950 PSIG

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ANALYTICAL ACCURACY**	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

** Do not use when cylinder pressure is below 150 psig.

* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

EP/CRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
CRM 2350	01Apr2012	A6820	23.51	OXYGEN
CRM 0260	02Oct2012	ALM038515	254.4PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
IR//000929060	23Mar2009	FTIR
IR//000929060	11Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis Second Triad Analysis Calibration Curve

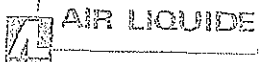
OXYGEN
 Date: 25Mar2009 onse Unit: VOL%
 1=0.000001=0.990001=0.22180
 2=0.989702=0.000702=0.22100
 3=0.000803=0.220703=0.98900
 Avg. Concentration: %
 Concentration=A+Bx+Cx2+Dx3+Ex4
 r=.9999978
 Constants: A=-.00703813
 B=23.71576885
 D= E=

SULFUR DIOXIDE *
 Date: 24Mar2009 onse Unit: PPM
 1=-0.00023=254.19041=124.6734
 2=254.2501=0.153462=125.0360
 3=0.258713=125.31913=254.2770
 Avg. Concentration: PPM
 Date: 31Mar2009 onse Unit: PPM
 Z1=-0.03914=254.1434=125.7700
 R2=254.4486=0.084472=126.0405
 Z3=0.170743=126.1121=254.6616
 Avg. Concentration: PPM
 Concentration=A+Bx+Cx2+Dx3+Ex4
 r=.999995E-1
 Constants: A=0.00000E+0
 B=9.97420E-1=0.00000E+0
 D=0.00000E+0=0.00000E+0

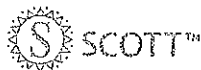
Special Notes: PAS00021

PROVED BY:

Ramien JR



Air Liquide America
Specialty Gases LLC



RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: Interference Free TM Multi-Component EPA Protocol Gas

Assay Laboratory

AIR LIQUIDE AMERICA SPECIALTY GASES LLC
9810 BAY AREA BLVD
PASADENA, TX 77507

P.O. No.: ALAS-44414/32924056
Project No.: 04-72466-002

Customer

RHODIA INC
PO#4500699213
8615 MANCHESTER
HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards; Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: 09Apr2009 Exp. Date: 09Apr2011
Cylinder Pressure***: 1912 PSIG

ANALYTICAL

ACCURACY**

TRACEABILITY

COMPONENT

CERTIFIED CONCENTRATION (Moles)

OXYGEN	13.6 %	+/- 1 %	
SULFUR DIOXIDE *	272 PPM	+/- 1 %	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pro

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51 %	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4 PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

SERVOMEX/MODEL 244A/701/716
FTIR//000929060

DATE LAST CALIBRATED

23Mar2009
12Mar2009

ANALYTICAL PRINCIPLE

PARAMAGNETIC
FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 08Apr2009 Response Unit: VOLTS
Z1=0.00000 R1=0.99000 T1=0.57210
R2=0.99000 Z2=0.00000 T2=0.57170
Z3=0.00000 T3=0.57140 R3=0.98950
Avg. Concentration: 13.56 %



Concentration = A + Bx + Cx2 + Dx3 + Ex4
r = 0.9999978
Constants: A = -0.00703813
B = 23.71976885 C =
D = E =

SULFUR DIOXIDE *

Date: 02Apr2009 Response Unit: PPM
Z1=-0.17978 R1=255.8503 T1=273.1567
R2=255.9913 Z2=0.38507 T2=274.0137
Z3=0.38875 T3=274.3073 R3=256.2128
Avg. Concentration: 272.1 PPM

Date: 09Apr2009 Response Unit: PPM
Z1=-0.64785 R1=255.2667 T1=273.4320
R2=255.3414 Z2=-0.17780 T2=273.9350
Z3=0.04655 T3=274.0129 R3=255.5704
Avg. Concentration: 272.7 PPM

Concentration = A + Bx + Cx2 + Dx3 + Ex4
r = 0.999988E-1
Constants: A = 0.00000E+0
B = 1.00080E+0 C = 3.00000E-6
D = 0.00000E+0 E = 0.00000E+0

Special Notes:

LOT # PAS00063

APPROVED BY:

Peter Brandon



Eco Services - Houston

Quarterly Cylinder Gas Audit Checklist Stack SO₂ Analyzer

Unit Number (Circle One):

2

(8)

Date: 10/14/09

Time: 2:35 pm

Technician: F. Cortez

Serial Number: VE-920-8700-2

Signature: F. Cortez

Cylinder ID number	<u>ALM049888</u>		<u>ALM056870</u>			
Date of Certification	<u>3/31/09</u>		<u>3/31/09</u>			
Type of certification (e.g. EPA Protocol 1 or CRM).	<u>Rate Class</u> <u>Dual-Analyzed Cal</u> <u>921 ppm</u>		<u>Rate Class</u> <u>Dual-Analyzed Cal</u> <u>2000 ppm</u>			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C_a (ppm)	<u>921 ppm</u>	<u>2000 ppm</u>	<u>921 ppm</u>	<u>2000 ppm</u>	<u>921 ppm</u>	<u>2000 ppm</u>
CEM Response value C_m (ppm)	<u>920 ppm</u>	<u>1987 ppm</u>	<u>926 ppm</u>	<u>1994 ppm</u>	<u>929 ppm</u>	<u>1995</u>
Accuracy A (% or ppm)	<u>0.109%</u>	<u>0.650%</u>	<u>0.543%</u>	<u>0.300%</u>	<u>0.869%</u>	<u>0.250%</u>

where $A = \frac{(C_m - C_a)}{C_a} \times 100$

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800 Fax: 281-474-5857

CERTIFICATE OF ACCURACY: EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32924771IA

AIR LIQUIDE AMERICA SPECIALTY Gases Project No.: 2342-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM056870 Certification Date: Mar2009 Exp. Date: 1Mar2012

Cylinder Pressure***: 1961 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
SULFUR DIOXIDE *	2,000 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 1664	02Oct2011	ALM059631	2402.PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#
FTIR//000929060

DATE LAST CALIBRATED
12Mar2009

ANALYTICAL PRINCIPLE
FTIR

ANALYZER READINGS

(Z=Zero Gas	R=Reference Gas	T=Test Gas	r=Correlation Coefficient)
First Triad Analysis	Second Triad Analysis		Calibration Curve
SULFUR DIOXIDE *			
Date: 24Mar2009 onse Unit: PPM	Date: 31Mar2009 onse Unit: PPM	Concentration=A+Bx+Cx2+Dx3+Ex4	
Z1=-0.09484=2383.3091=1982.431	Z1=-0.10409=2384.951=1985.128	r=9.99988E-1	
R2=2384.241=0.52271T2=1983.385	R2=2386.811=0.440912=1986.040	Constants: A=0.00000E+0	
Z3=0.959453=1984.8833=2385.906	Z3=0.794043=1986.489=2387.704	B=1.00080E+0=3.00000E-6	
Avg. Concentration: PPM	Avg. Concentration: PPM	D=0.00000E+0=0.00000E+0	

Special Notes: DOC# PAS00014

APPROVED BY: _____
Ramien JR

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/329246431A

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2341-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1, September, 1997.

Cylinder Number: ALM049888 Certification Date: Mar2009 Exp. Date: 1Mar2012

Cylinder Pressure***: 1968 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
SULFUR DIOXIDE *	921 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 1662	15May2010	KAL003254	975.0PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)	
First Triad Analysis	Second Triad Analysis Calibration Curve
SULFUR DIOXIDE *	
Date: 24Mar2009 onse Unit: PPM	Date: 31Mar2009 onse Unit: PPM
Z1=-0.21684=975.66891=921.6842	Z1=-0.01294=976.8492=923.0907
R2=976.8102=-0.119112=921.6935	R2=977.8269=0.272432=923.4876
Z3=0.305253=922.84413=977.0351	Z3=0.506993=923.6709=978.0656
Avg. Concentration: PPM	Avg. Concentration: PPM
Concentration=A+Bx+Cx2+Dx3+Ex4	
r=9.99988E-1	
Constants: A=0.00000E+0	
B=1.00080E+0=3.00000E-6	
D=0.00000E+0=0.00000E+0	

Special Notes: DOC# PAS00013

APPROVED BY:

Ramien JR

QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: #5 STACK O₂

Date: 10/14/09 Time: 2:10 PM

Serial Number: VF-920-8700-2

Technician: F. Cortes

Signature: F. Cortes

EXP DATE	3/31/11	4/9/11				
Cylinder ID number	ALM048359	ALM049305				
Date of Certification	4/2/09	4/9/09				
Type of certification (e.g. EPA Protocol 1 or CRM).	LATA CLASS Dual Analyzed Cal 5.25% O ₂	LATA CLASS Dual Analyzed Cal 13.6% O ₂				
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C _a (ppm)	5.25%	13.6%	5.25%	13.6%	5.25%	13.6%
CEM Response value C _m (ppm)	5.27%	13.8%	5.25%	13.8%	5.24%	13.8%
Accuracy A (% or ppm)	0.02%	0.20%	0.0%	0.20%	0.01%	0.20%

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



Scott Specialty Gases
www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2334-001 PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM048359 Certification Date: Mar2009 Exp. Date: 1Mar2011

Cylinder Pressure***: 1950 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
ITRM 2350	01Apr2012	A6820	23.51	OXYGEN
ITRM 0260	02Oct2012	ALM038515	254.4PM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
TIR//000929060	23Mar2009	FTIR
TIR//000929060	11Mar2009	FTIR

ANALYZER READINGS

First Triad Analysis	Second Triad Analysis	Calibration Curve
(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)		

OXYGEN

Date: 25Mar2009 onse Unit: VOL/LT

1=0.000001=0.99000T1=0.22180

2=0.989702=0.00070T2=0.22100

3=0.000803=0.22070R3=0.98900

avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=.9999978

Constants: A=-.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

1=-0.00023=254.19041=124.6734

2=254.2501=0.15346T2=125.0360

3=0.258713=125.31913=254.2770

avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.03914=254.1434=125.7700

R2=254.4486=0.084472=126.0405

Z3=0.170743=126.1121=254.6616

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99995E-1

Constants: A=0.00000E+0

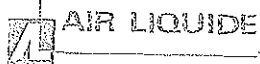
B=9.97420E-1=0.00000E+0

D=0.00000E+0=0.00000E+0

Special Notes: PAS00021

APPROVED BY:

Ramien JR



Air Liquide America
Specialty Gases LLC



RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: Interference Free TM Multi-Component EPA Protocol Gas

Assay Laboratory

AIR LIQUIDE AMERICA SPECIALTY GASES LLC Project No.: 04-72466-002
9810 BAY AREA BLVD
PASADENA, TX 77507

P.O. No.: ALAS-44414/32924056

Customer

RHODIA INC
PO#4500699213
8615 MANCHESTER
HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards; Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: 09Apr2009 Exp. Date: 09Apr2011
Cylinder Pressure***: 1912 PSIG

COMPONENT	CERTIFIED CONCENTRATION (Moles)		ANALYTICAL ACCURACY**	TRACEABILITY
OXYGEN	13.6	%	+/- 1%	
SULFUR DIOXIDE *	272	PPM	+/- 1%	Direct NIST and NMi
NITROGEN		BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pro

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51 %	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4 PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
SERVOMEX/MODEL 244A/701/716	23Mar2009	PARAMAGNETIC
FTIR/000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z = Zero Gas R = Reference Gas T = Test Gas r = Correlation Coefficient)

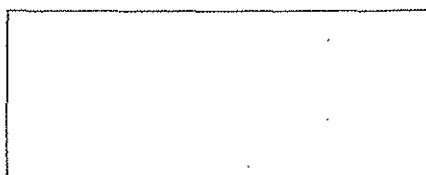
First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 08Apr2009	Response Unit: VOLTS	
Z1=0.00000	R1=0.99000	T1=0.57210
R2=0.99000	Z2=0.00000	T2=0.57170
Z3=0.00000	T3=0.57140	R3=0.98950
Avg. Concentration: 13.56 %		



Concentration = A + Bx + Cx2 + Dx3 + Ex4	
r = 0.9999978	
Constants:	A = -0.00703813
B = 23.71576885	C =
D =	E =

SULFUR DIOXIDE *

Date: 02Apr2009	Response Unit: PPM	
Z1=-0.17978	R1=255.8503	T1=273.1567
R2=255.9913	Z2=0.38507	T2=274.0137
Z3=0.38875	T3=274.3073	R3=256.2128
Avg. Concentration: 272.1 PPM		

Date: 09Apr2009	Response Unit: PPM	
Z1=-0.64785	R1=255.2667	T1=273.4320
R2=255.3414	Z2=-0.17780	T2=273.9350
Z3=0.04655	T3=274.0129	R3=255.5704
Avg. Concentration: 272.7 PPM		

Concentration = A + Bx + Cx2 + Dx3 + Ex4	
r = 9.99988E-1	
Constants:	A = 0.00000E+0
B = 1.00080E+0	C = 3.00000E-6
D = 0.00000E+0	E = 0.00000E+0

Special Notes:

LOT # PAS00063

APPROVED BY:

Peter Brandon

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

RHODIA INC.
HOUSTON PLANT
VIRGIN SULFURIC ACID UNIT NO. 8 (EPN 101)
OXYGEN (O₂) AND SULFUR DIOXIDE (SO₂)
CONTINUOUS EMISSION MONITORING SYSTEM (CEMS)
RELATIVE ACCURACY TEST AUDIT (RATA)
(REGULATED ENTITY NO. RN100220581; CUSTOMER REFERENCE NO. CN600125330
TCEQ ACCOUNT ID NO. HG-0697-O; PERMIT NO. 19282)

(ENTECH REPORT NO. ER2009-06-203)

PREPARED BY

ENTECH ENGINEERING INC.
LEAGUE CITY, TEXAS

JULY 2009

PREPARED FOR

RHODIA INC.
HOUSTON, TEXAS

SAMPLING LOCATION

VIRGIN SULFURIC ACID UNIT NO. 8 STACK (EPN 101)
RHODIA INC.
HOUSTON, HARRIS COUNTY, TEXAS

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

SECTION 1.0 SUMMARY

Entech Engineering Inc. (Entech) was retained by Rhodia Inc. (Rhodia) to conduct an oxygen (O_2) and sulfur dioxide (SO_2) Continuous Emission Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) at Rhodia's Virgin Sulfuric Acid Unit No. 8 in Houston, Harris County, Texas. The objective of this program was to quality assure the continuous performance of the O_2 and SO_2 CEMS according to the specifications of EPA 40 CFR, Part 60, Appendix F.

In this program, the quality assurance test, i.e. RATA was conducted according to the 40CFR60, Appendix F, Section 5.1.1 specifications following the procedures of 40CFR60, Appendix B, Performance Specification 2 and 3 for the SO_2 and O_2 CEMS, respectively. A Performance Specification (PS) test consists of two parts, a Calibration Drift (CD) Determination and a Relative Accuracy (RA) Determination; however, a RATA only requires that the RA determination be conducted. For this program, the RATA was conducted on May 27, 2009 and was coordinated by Mr. Wesley Carter of Rhodia Inc. TCEQ was notified of the test, but did not attend.

The Virgin Sulfuric Acid Unit No. 8 is designated in the Texas Commission on Environmental Quality (TCEQ) permit as Emission Point Number (EPN) 101. Its CEMS comprises of a Bovar/Western Research O_2/SO_2 analyzer (Model 920, Serial Number VE-920-8700-2). Flue gas samples are continuously extracted from the stack for analysis on a wet basis. During testing, operational parameters were monitored and recorded by Rhodia personnel at fifteen-minute intervals for demonstration of process conditions.

Results of the O_2 and SO_2 CEMS RATA results are presented in Table 1. A comprehensive summary which includes individual test data is presented in Table 2 and 3. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

ENTECH ENGINEERING INC.

P.O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

Table 1.
Rhodia Inc.
Houston Plant
Virgin Sulfuric Acid Unit No. 8 (EPN 101)
Oxygen(O₂) and Sulfur Dioxide (SO₂) CEMS Relative Accuracy Test Audit (RATA)
Regulated Entity No. RN100220581; Customer Reference No. CN600125330
TCEQ Account ID No. HG-0697-O; Permit No. 19282

Performance Specification Test Parameters	Continuous Emission Monitoring Systems (CEMS)	
	Oxygen (O ₂)	Sulfur Dioxide (SO ₂)
RA Test	Passed	Passed
RA Allowed	+/- 1.0% O ₂	20% (RM) or 10% (STD)
RA	-0.11%	1.07% (STD)

(RM) - Reference Method

(STD) - Emission Standard or Performance Specification Standard

RA - Relative Accuracy Test

NA - Not Applicable

AC/AY/co

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Coordination Branch
BEN-A



CERTIFIED MAIL: Return Receipt Requested (7008 1830 0000 4280 5787)

January 26, 2010

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Steve
Thompson

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
October 1, 2009 to December 31, 2009
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh
Page 2

- Pursuant to 61.357(d)(7)(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Sam Keen at (713) 924-1484 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Table 1

**Rhodia Inc.
Houston, Texas
Benzene Waste NESHA Inspection Requirements
For Quarterly Period Ending: December 31, 2009**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
Initial and annual Method 21 inspections of containers per 61.345(a)(1)	x Yes Except as Noted	
Initial and quarterly visual inspections of containers per 61.345(b)	x Yes Except as Noted	
Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii)	x Yes Except as Noted	
Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f)	x Yes Except as Noted	
Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c)	x Yes Except as Noted	

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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Air/Toxics & Inspection
Coordination Branch
6EN-A



Certified Mail; Return Receipt Requested (7008 1830 0000 4280 4794)

January 26, 2010

Mr. David Neleigh
Air Permits Section
6PD-R
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Steve
Thompson

Re: HON Semiannual Report per 40 CFR 63.152(c)
TCEQ Identification Nos.: RN100220581/CN600125330

Dear Mr. Neleigh:

Rhodia, Inc. (Rhodia) is an offsite treatment facility for 40 CFR Part 63 Subpart G (HON) Group 1 wastewater streams and residuals. Rhodia submitted a letter on August 6, 1998 certifying that it will manage and treat any HON-regulated Group 1 wastewater stream or residual removed from a Group 1 wastewater stream in accordance with the applicable requirements in 40 CFR 63.133 through 63.147. On November 8, 2006, Rhodia submitted the Notification of Compliance Status (NCS) Report per 40 CFR 63.152(b). Per 40 CFR 63.146(c) and 63.152(c), semiannual reports are also required. This submittal includes the semiannual report for the period of July 1 to December 31, 2009.

Specific elements of the semi-annual report are listed below:

63.146(c) - For each tank storing HON Group 1 wastewater or residuals, the results of each inspection in which a control equipment failure (a gasket, joint, lid, cover, or door has a crack or gap, or is broken) was identified. Include the date of the inspection, identification of each waste management unit (tank) in which a control equipment failure was detected, description of the failure, and description of the nature of and date the repair was made.

HON Group 1 wastewater and residuals may be stored in one or more of the six (6) Treatment Services (TS) tanks. There were no control equipment failures identified for these tanks in the reporting period.

63.146(d) - Treatment process monitoring data.

The treatment process is a RCRA unit and is exempt from monitoring per 63.138(h).

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. David Neleigh
Page 2

63.146(e)(1), Table 20 item (1) - For each tank storing HON Group 1 wastewater or residuals that vents to a thermal incinerator for vapor control, report all daily average temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected.

The TS tanks normally vent to the Regeneration Unit No. 2 (Regen 2) sulfuric acid furnace which is exempt from monitoring per 63.139(d)(4)(iv). In the event that Regen 2 is unavailable, tank vapors are routed to the Treatment Services Vapor Combustor (TSVC). The TSVC minimum combustion temperature is 1500 F per operating permit. During this reporting period, there were no instances of the daily average TSVC combustion temperature being under 1500 F while TS tanks were venting to it. There were no days when insufficient monitoring data were collected during this reporting period.

63.146(e)(1), Table 20 item (8)(i) and 63.148(j)(2) - For closed vent systems used to convey HON wastewater tank vapors to a control device, any bypass valves and lines must be equipped with a flow indicator or car-seal. Report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor (flow indicator) is not operating.

The vent stream was not diverted to the atmosphere this reporting period. We do not use flow indicators for this purpose.

63.146(e)(1), Table 20 item (8)(ii) and 63.148(j)(3) - Report the times and durations of any periods when the bypass valves are moved to the diverting position, the seal has been changed, the seal mechanism is broken, or the key to unlock the bypass line valve was checked out.

There were no bypass valve or car-seal abnormalities this reporting period. We do not use lock-and-key mechanisms for this purpose.

Please contact Floyd Dickerson at 713-924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

AL/AV/CO

110000460901 T079
v.6



RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

Eco Services Enterprise
Houston/Baytown Plants

RECEIVED

JUL 12 2010

Analysis & Inspection
Coordination Branch
BEN-A

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 0574)

July 7, 2010

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

RE: Rhodia Inc.
Houston, Texas
Title V Semi-Annual Deviation Report
Permit No.: O-01609
Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the semi-annual Title V deviation report for the Rhodia Houston, Texas facility which covers the period from December 10, 2009 to June 9, 2010.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Keen".

Sam Keen
Environmental Engineer

Attachments

cc: Chief, Air Branch
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Shankle
Executive Director
Texas Commission on Environmental Quality
MC 109
P.O. Box 13087
Austin, TX 78711-3087

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
Health and Human Services Department
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
A. RN: 100220581	B. CN: 600125330	C. Account No.: HG-0697-O
D. Permit No.: O-01609	E. Project No.:	
F. Area Name: Houston Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE <i>(Please mark the appropriate box)</i>		
A. <input type="checkbox"/> Responsible Official:	B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE <i>(Place an "X" in the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: Title V Semiannual Deviation Report		
IV. CERTIFICATION OF TRUTH		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>William McConnell</u> , certify that I am the <u>DAR</u> for this application <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i>		
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:		
<i>Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>		
A. Time Period: From <u>12/10/09</u> to <u>6/9/10</u> <i>Start Date*</i> <i>End Date*</i>		
OR		
B. Specific Dates: _____ <i>Date 1*</i> <i>Date 2*</i> <i>Date 3*</i> <i>Date 4*</i> <i>Date 5*</i> <i>Date 6*</i> <i>Date 7*</i> <i>Date 8*</i>		
<i>*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'</i>		
Signature: <u>William McConnell</u>		Signature Date: <u>7/7/10</u>
Title: Plant Manager		



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided)			
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application)			
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input checked="" type="checkbox"/> Other	Title V Semi-Annual Deviation Form
2. Attachments Describe Any Attachments: (ex. Title V Application, Waste Transporter Application, etc.)			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Title V Semi-Annual Deviation Report and OP-CRO1			
3. Customer Reference Number (if issued)		4. Regulated Entity Reference Number (if issued)	
CN 600125330		RN 100220581	

SECTION II: Customer Information

5. Effective Date for Customer Information Updates (mm/dd/yyyy)		4/29/2009	
6. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check only one of the following:			
<input type="checkbox"/> Owner	<input type="checkbox"/> Operator	<input checked="" type="checkbox"/> Owner & Operator	
<input type="checkbox"/> Occupational Licensee	<input type="checkbox"/> Responsible Party	<input type="checkbox"/> Voluntary Cleanup Applicant	<input type="checkbox"/> Other: _____
7. General Customer Information			
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information	<input type="checkbox"/> Change in Regulated Entity Ownership
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State)		<input type="checkbox"/> No Change**	
**If "No Change" and Section I is complete, skip to Section III – Regulated Entity Information.			
8. Type of Customer:		<input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Individual <input type="checkbox"/> Sole Proprietorship- D.B.A	
<input type="checkbox"/> City Government	<input type="checkbox"/> County Government	<input type="checkbox"/> Federal Government	<input type="checkbox"/> State Government
<input type="checkbox"/> Other Government	<input type="checkbox"/> General Partnership	<input type="checkbox"/> Limited Partnership	<input type="checkbox"/> Other: _____
9. Customer Legal Name (If an individual, print last name first. ex: Doe, John)		If new Customer, enter previous Customer below End Date:	
Rhodia Inc.			
10. Mailing Address:			
8 Cedar Brook			
City	Cranbury	State	NJ
ZIP	08512	ZIP + 4	7500
11. Country Mailing Information (if outside USA)		12. E-Mail Address (if applicable)	
13. Telephone Number		14. Extension or Code	
(609) 860-4000			
15. Fax Number (if applicable)			
(609) 409-2845			
16. Federal Tax ID (9 digits)	17. TX State Franchise Tax ID (11 digits)	18. DUNS Number (if applicable)	19. TX SOS Filing Number (if applicable)
223539954	12235399545	002959810	
20. Number of Employees		21. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

SECTION III: Regulated Entity Information

22. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)			
<input type="checkbox"/> New Regulated Entity <input type="checkbox"/> Update to Regulated Entity Name <input checked="" type="checkbox"/> Update to Regulated Entity Information <input type="checkbox"/> No Change** (See below)			
**If "NO CHANGE" is checked and Section I is complete, skip to Section IV, Preparer Information.			
23. Regulated Entity Name (name of the site where the regulated action is taking place)			

Rhodia Inc.							
24. Street Address of the Regulated Entity: (No P.O. Boxes)	8615 Manchester Street						
	City	Houston	State	TX	ZIP	77012	ZIP + 4
25. Mailing Address:	8615 Manchester Street						
	City	Houston	State	TX	ZIP	77012	ZIP + 4
26. E-Mail Address:							
27. Telephone Number	28. Extension or Code		29. Fax Number (if applicable)				
(713) 928-3411			(713) 835-3252				
30. Primary SIC Code (4 digits)	31. Secondary SIC Code (4 digits)	32. Primary NAICS Code (5 or 6 digits)		33. Secondary NAICS Code (5 or 6 digits)			
2819		325188					
34. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.)							
Manufacture of sulfuric acid and commercial hazardous waste incineration							

Questions 34 – 37 address geographic location. Please refer to the instructions for applicability.

35. Description to Physical Location:					
36. Nearest City	County	State	Nearest ZIP Code		
Houston	Harris	TX	77012		
37. Latitude (N) In Decimal:	38. Longitude (W) In Decimal:				
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
29	43	20	95	16	20

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form or the updates may not be made. If your Program is not listed, check other and write it in. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input checked="" type="checkbox"/> Industrial Hazardous Waste	<input type="checkbox"/> Municipal Solid Waste
			50095	
<input checked="" type="checkbox"/> New Source Review – Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS	<input type="checkbox"/> Sludge
4802, 19282, 56566				
<input type="checkbox"/> Stormwater	<input checked="" type="checkbox"/> Title V – Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil	<input type="checkbox"/> Utilities
	O3049			
<input type="checkbox"/> Voluntary Cleanup	<input checked="" type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:
	00542			

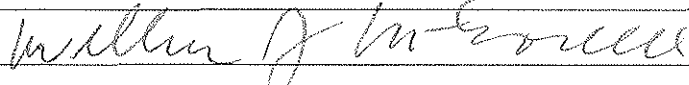
SECTION IV: Preparer Information

40. Name:	Samuel E. Keen, PE	41. Title:	Environmental Engineer
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address
(713) 924-1484		(713) 835-3261	sam.keen@us.rhodia.com

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 9 and/or as required for the updates to the ID numbers identified in field 39.

(See the Core Data Form instructions for more information on who should sign this form.)

Company:	Rhodia Inc.	Job Title:	Plant Manager
Name (In Print):	William J. McConnell	Phone:	(713) 924-1401
Signature:		Date:	7/7/10

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.	HG-0697-O		
Area Name		Regeneration Unit No. 2				Operating Permit No.	O-01609		
Report Period Began on		12/10/2009		And Ended on		06/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Pro-Regen 2		Permit 4802, SC 1	SO2 & SO3	30 TAC 101.201	Standard	REG 2 - 0002			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit (recordable emission event)	Restore power to unit and check for damage.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather (recordable emission event)	Unfreeze pipes and safely restore plant to production levels
IR-ECO-HO-2009-10	1/14/10	11:00 AM	1/14/10	1:54 PM	1	SO3 leak from top of Tank 77 (recordable emission event)	Repair leaking equipment and monitor to ensure that repairs are effective
IR-ECO-HO-2009-15	1/17/10	7:00 AM	1/7/10	5:48 PM	1	SO3 leak from top of Tank 77 (recordable emission event)	Repair leaking equipment and monitor to ensure that repairs are effective
IR-ECO-HO-2009-29	1/29/10	6:00 AM	2/4/10	11:22 AM	1	Seal box leak on Tank 78 (recordable emission event)	Repair rusted line and restore water flow to seal box, thus preventing loss of tank emissions through the box
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation
Total Deviations:					6		

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Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.	Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2	Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	06/09/2010
		Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Pro-Regen 2		Permit 4802, SC 1	SO2 & SO3	30 TAC 101.201	Standard	REG 2 - 0002		

IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	9:28 PM	5/10/10	1:48 AM	1	Planned outage in unit with proper vapor combustor operation (recordable emission event)	Complete maintenance activities during planned outage, and restore unit furnace to typical operation
IR-ECO-HO-2010-119	5/17/10	12:40 AM	5/17/10	7:28 AM	1	Planned outage in unit with proper vapor combustor operation (recordable emission event)	Complete maintenance activities during planned outage, and restore unit furnace to typical operation
IR-ECO-HO-2010-145	6/7/10	10:30 AM	6/7/10	1:37 PM	1	East 2/3 Windbox SO2 leak (recordable emission event)	Repair windbox leak after rain downpour and return to service
Total Deviations:					6		

Company Name		Rhodia Inc.			Account No.		HG-0697-O	
Area Name		Tanks S1 and S2			Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)		Pollutant (Rq'd if Applicable)		Regulatory Requirement (Citation Rq'd if Applicable)		Type of Requirement (Rq'd)
SOP or GOP Index Number (See Instructions)		Monitoring Requirements (Rq'd as Applicable)		Citation		Frequency		
Unit ID	Group ID	56566, Special Condition 4		H2S		30 TAC 112.31		Permit Requirement

Details of Deviations from Above Referenced Requirement							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	9/12/2008				1	The newly-amended permit requires the stacks on Sulfur Tanks S1 and S2 to reach a minimum height of 60 feet. TCEQ denied Rhodia's request to submit a compliance plan in order to comply with this requirement. Therefore, during the time in which Rhodia seeks an engineering solution to raise the stacks to the required height, the stacks are not compliant with the above-referenced permit condition.	Permit received 9/12/08. Rhodia is currently addressing the engineering, logistical, and safety elements of this project, and seeking qualified designs to complete the work. TCEQ did not accept Rhodia's request to submit a compliance schedule for this work. These stacks will be in operation by December, 2010. This deviation has been addressed in Investigation #794145
Total Deviations:					1		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date	
								7/7/2010	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2009-313	12/28/09	7:40	12/28/09	11:45	1	Gas leak on 4 th pass converter duct (recordable emission event)	Repair duct leak quickly and check to ensure that patch is operable
IR-ECO-HO-2009 - 314	12/28/09	7:40	12/28/09	11:45	1	Gas leak on crack in converter shell (recordable emission event)	Repair crack and monitor
IR-ECO-HO-2010-2	1/4/10	7:00	1/5/10	10:25	1	Gas leak from converter at 4 th level (recordable emission event)	Repair leak and monitor patch to ensure complete effectiveness
IR-ECO-HO-2010-3	1/5/10	8:45	1/5/10	9:10	1	Gas leak from converter at 4 th level (recordable emission event)	Repair leak and monitor patch to ensure complete effectiveness
IR-ECO-HO-2010-4	1/6/10	14:00	1/6/10	15:05	1	Crack in converter caused small SO2/SO3 leak (recordable emission event)	Repair and monitor crack in converter shell
IR-ECO-HO-2010-5	1/6/10	13:00	1/6/10	14:09	1	Gas leak from #2 layer on converter duct to boiler (recordable emission event)	Repair duct leak, monitor for additional leakage
Total Deviations:					6		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)		Pollutant (Rq'd if Applicable)		Regulatory Requirement (Citation Rq'd if Applicable)		Type of Requirement (Rq'd)	
Unit ID		Group ID				SOP or GOP Index Number (See Instructions)		Monitoring Requirements (Rq'd as Applicable)	
								Citation	
								Frequency	
PRO-UNIT 8				Permit 19282, SC 1		SO2 & SO3		30 TAC 101.201	
						Authorized Emissions			

Details of Deviations from Above Referenced Requirement							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2010-6	1/7/10	7:00	1/7/10	14:36	1	Gas leak from #2 layer on converter duct to boiler (recordable emission event)	Repair duct leak, monitor for additional leakage
IR-ECO-HO-2010-8	1/11/10	10:00	1/12/10	10:24	1	Hole in furnace windbox caused emission of SO2 (recordable emission event)	Identify and repair cause of leak and monitor
IR-ECO-HO-2010-21	1/27/10	7:00	1/27/10	8:45	1	Crack in furnace shell caused leak of SO2 (recordable emission event)	Quickly repair crack in furnace shell and monitor
IR-ECO-HO-2010-24	2/2/10	9:45	2/2/10	10:46	1	Small leak on #1 boiler shell released vapors (recordable emission event)	Repair boiler leak and monitor to prevent further emissions
IR-ECO-HO-2010-37	2/22/10	7:00	2/22/10	12:21	1	Small pencil-thin leak in absorbing tower duct (recordable emission event)	Patch small leak and observe tower shell for further leaks
IR-ECO-HO-2010-41	2/24/10	6:00	2/24/10	15:54	1	Hot end #2 boiler gas leak (recordable emission event)	Repair gas leak from boiler and monitor
Total Deviations:					6		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date	
								7/7/2010	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation		Frequency
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2010-43	2/25/10	4:00	2/25/10	9:26	1	Hot end #2 boiler gas leak (recordable emission event)	Repair gas leak from boiler and monitor
IR-ECO-HO-2010-45	2/25/10	10:30	2/25/10	13:22	1	Small leak in absorbing tower duct (recordable emission event)	Patch small leak and observe tower shell for further leaks
IR-ECO-HO-2010-53	3/10/10	12:00	3/10/10	12:25	1	Hot end #2 boiler gas leak (recordable emission event)	Repair gas leak from boiler and monitor
IR-ECO-HO-2010-54	3/10/10	12:00	3/10/10	12:29	1	Small gas leak from oleum tower manway (recordable emission event)	Repair leak and inspect manway to ensure leak is properly stopped. Monitor.
IR-ECO-HO-2010-55	3/10/10	14:45	3/11/10	17:11	1	Packing leak from 84" valve in unit (recordable emission event)	Repair valve packing and monitor
IR-ECO-HO-2010-56	3/11/10	7:00	3/11/10	17:19	1	Gas leak on economizer exit duct (recordable emission event)	Repair duct leak, monitor for additional leakage
Total Deviations:					6		

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Unit #8			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2010-60	3/17/10	8:00	3/17/10	15:24	1	Small wisp of SO2 at #1 boiler exit duct (recordable emission event)	Repair duct leak and monitor
IR-ECO-HO-2010-66	3/23/10	11:30	3/23/10	12:58	1	Expansion joint leak above #2 boiler (recordable emission event)	Replace expansion joint and monitor
IR-ECO-HO-2010-85	4/16/10	7:00	4/16/10	10:15	1	Small gas leak in unit duct work (recordable emission event)	Repair duct leak and monitor
IR-ECO-HO-2010-86	4/19/10	7:15	4/19/10	17:51	1	Leak on top of manway at absorbing tower (recordable emission event)	Repair manway leak and check tower for further leaks
IR-ECO-HO-2010-87	4/20/10	16:00	4/20/10	16:27	1	Small leak on entrance to duct at Brinks tower (recordable emission event)	Patch duct and monitor to ensure that patch is effective
IR-ECO-HO-2010-94	5/1/10	10:00	5/3/10	9:32	1	Gas leak on economizer exit duct (recordable emission event)	Repair duct leak, monitor for additional leakage
Total Deviations:					6		

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Unit #8			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2010-94	5/1/10	10:00	5/3/10	9:32	1	Gas leak on economizer exit duct (recordable emission event)	Repair duct leak, monitor for additional leakage
IR-ECO-HO-2010-97	5/5/10	13:20	5/5/10	13:50	1	Exit duct leak on #2 boiler (recordable emission event)	Repair duct leak on boiler, and monitor for additional leakage
IR-ECO-HO-2010-135	5/30/10	12:00	5/31/10	11:40	1	Oleum tower gas exit duct leak (recordable emission event)	Repair duct leak and monitor duct to ensure that further leakage does not occur
IR-ECO-HO-2010-136	5/30/10	12:00	5/31/10	12:45	1	#1 Expansion joint leak (recordable emission event)	Repair leak in expansion joint and monitor
IR-ECO-HO-2010-138	6/1/10	7:00	6/1/10	15:49	1	Unit furnace front end leak (recordable emission event)	Repair leak, monitor furnace closely to ensure that patch is successful
IR-ECO-HO-2010-141	6/1/10	14:10	6/2/10	11:40	1	SO3 leak in 65% acid building (recordable emission event)	Repair small leak and monitor to ensure that leak does not persist
Total Deviations:					6		

Company Name		Rhodia Inc.				Account No.	HG-0697-O		
Area Name		Unit #8				Operating Permit No.	O-01609		
Report Period Began on		12/10/2009		And Ended on		6/9/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO- HO-2010- 143	6/6/10	21:30	6/6/10	22:08	1	#1 Boiler Exit duct leak (recordable emission event)	Repair duct leak and monitor boiler
IR-ECO- HO-2010- 144	6/6/10	21:30	6/6/10	22:12	1	#8 furnace windbox leak (recordable emission event)	Repair windbox and monitor to ensure that leak is repaired completely
Total Deviations:					2		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Regeneration Unit No. 2				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	
								7/7/2010	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No.	Pollutant (Rq'd if Applicable)	Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		
Unit ID		Group ID	(Rq'd If Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation		Frequency
170			Permit 4802, SC 1	VOC	30 TAC 115.122(a)(1)(a)	Authorized Emissions	R5112-0001A		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.	HG-0697-O		
Area Name		Regeneration Unit No. 2				Operating Permit No.	O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
170		Permit 4802	VOC	Permit 4802, GC 1	Permit Representation	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.	HG-0697-O		
Area Name		Regeneration Unit No. 2				Operating Permit No.	O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 48		Permit 4802. SC 1	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 49		Permit 4802. SC 1	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 53		Permit 4802. SC 1	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Tank 56		Permit 4802. SC 1	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Tank 78		Permit 4802. SC 1	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
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IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Tank 48		Permit 4802. SC 1	SO2	30 TAC 101.201	Authorized Emissions	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
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IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 49		Permit 4802. SC 1	SO2	30 TAC 101.201	Authorized Emissions	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
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IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 53		Permit 4802. SC 1	SO2	30 TAC 101.201	Authorized Emissions	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
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Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Tank 56		Permit 4802. SC 1	SO2	30 TAC 101.201	Authorized Emissions	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
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Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Tank 78		Permit 4802. SC 1	SO2	30 TAC 101.201	Authorized Emissions	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Regeneration Unit No. 2				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	
								7/7/2010	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 48		Permit 4802	VOC	40 CFR Subpart Kb	Control Requirement	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
Tank 49		Permit 4802	VOC	40 CFR Subpart Kb	Control Requirement	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 53		Permit 4802	VOC	40 CFR Subpart Kb	Control Requirement	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Houston Plant			Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/2010

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
		Permit O-01609		30 TAC 122	Standard	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	12/10/07				1	Title V Permit Expired without renewal. Renewal application received late and rejected by TCEQ.	Application for new Title V permit submitted in a timely fashion to TCEQ, and application process followed. New Title V Permit issuance is expected in the near term. Application has been held up by EPA objection.
Total Deviations:					1		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.	HG-0697-O	
Area Name		Sulfuric Acid Unit 8				Operating Permit No.	O-01609	
Report Period Began on		12/10/2009		And Ended on	6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	
101		Permit 19282 SC 1	PM10		Authorized Emissions	Reg2-0001	Frequency continuous	

Details of Deviations from Above Referenced Requirement							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	11/19/08				1	Upon startup of the No. 8 scrubber system, source testing revealed a new pollutant, PM10, which is not permitted. (addressed in Texas Audit Privledge Act report dated 10/9/09)	An air permit amendment addressing these PM10 emissions will be sought from TCEQ. Methodology is currently under review with TCEQ.
Total Deviations:					1		
Total Deviations:							

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	
7/7/2010									
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation		Frequency
PRO-UNIT 8		Permit 19282, SC 6	SO2 & SO3	30 TAC 112.6(c)	Monitoring				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2010-7	1/9/10	23:30	1/10/10	11:15	1	SO2/SO3 CEMS Analyzer failed due to freezing weather	Analyzer signal was re-established after thawing unit. Reich test was used instead of analyzer during downtime in order to collect accurate emissions information
IR-ECO-HO-2010-36	2/19/10	5:07	2/19/10	23:20	1	SO2/SO3 CEMS Analyzer failed	Analyzer signal was re-established after troubleshooting. Reich test was used instead of analyzer during downtime in order to collect accurate emissions information
IR-ECO-HO-2010-91	4/22/10	11:00	4/22/10	13:07	1	SO2/SO3 CEMS Analyzer failed	Analyzer signal was re-established after troubleshooting. Reich test was used instead of analyzer during downtime in order to collect accurate emissions information
Total Deviations:					6		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation		Frequency
117		Permit 56566, SC 1	NOx	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO- HO-2010- 34	2/11/10	13:33	2/12/10	15:55	1	Selective Catalytic Reduction in package boiler not effective due to lack of ammonia in system	Unit was shut down until ammonia could be replenished to system. After addition of catalytic ammonia, system worked effectively, reducing NOx concentration to below permitted levels.
Total Deviations:					6		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	
								7/7/2010	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
117		Permit 56566, SC 1	NOx	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement									
(Note: All elements, except Event No. are Required for Each Period of Deviation)									
IR-ECO- HO-2010- 121	3/22/10	14:30	3/22/10	23:45	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.		
IR-ECO- HO-2010- 121	4/29/10	18:00	4/29/10	23:15	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.		
IR-ECO- HO-2010- 121	5/16/10	4:45	5/16/10	14:30	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.		
IR-ECO- HO-2010- 121	5/17/10	9:45	5/17/10	14:00	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.		
Total Deviations:					4				

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Regeneration Unit No. 2				Operating Permit No.		O-01609	
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	
								7/7/2010	
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Citation							Frequency		
Tank 48			Permit 4802	VOC and SO2	Permit 4802, GC 1	Permit Representation	Reg2-0001		

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O		
Area Name	Regeneration Unit No. 2			Operating Permit No.	O-01609		
Report Period Began on	12/10/2009	And Ended on	6/09/2010	Report Submittal Date	7/7/10		
Operating Permit Requirement for Which Deviations are Being Reported							
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)
Unit ID	Group ID						Citation Frequency
Tank 49		Permit 4802	VOC and SO2	Permit 4802, GC 1	Permit Representation	Reg2-0001	

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
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	Date	Time	Date	Time			
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Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 53		Permit 4802	VOC and SO2	Permit 4802, GC 1	Permit Representation	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
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IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 56		Permit 4802	VOC and SO2	Permit 4802, GC 1	Permit Representation	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Regeneration Unit No. 2			Operating Permit No.		O-01609		
Report Period Began on		12/10/2009		And Ended on		6/09/2010		Report Submittal Date	7/7/2010
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
Tank 78		Permit 4802	VOC and SO2	Permit 4802, GC 1	Permit Representation	Reg2-0001			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO-2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
Total Deviations:					6		



RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

Ac/Ay/co
110000400201
TX079v6
**Eco Services Enterprise
Houston/Baytown Plants**

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JUL 14 2010

ATX Toxics & Inspection
Coordination Branch
ATXALA

Certified Mail Return Receipt Requested (7007 0220 0000 4422 0420)

July 8, 2010

Compliance Assurance and Enforcement Division (6EN)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: Rhodia Inc.
Houston, Texas Plant
NSPS Kb Semiannual Report – 1st Half 2010
Permit No. O-01609

To Whom It May Concern:

Per the 40 CFR Part 60 (NSPS) Subpart Kb operating plan for the Houston plant, the following tanks are subject to vapor control, or assumed to be subject to vapor control, per NSPS Subpart Kb.

Tank No.	Description	Contents	Control Device
B-1 B-2	Treatment Services (TS) Tanks	Volatile organic liquids (VOL)	Regeneration Unit No.2 Furnace with TS Vapor Combustor (TSVC) as backup
Tk 48 Tk 49 Tk 53 Tk 56* Tk 78*	Spent Acid (SA) Tanks	Spent sulfuric acid with potential for containing volatile organic liquids	Regeneration Unit No.2 Furnace with Spent Acid Vapor Combustor as backup.

**Available information indicates that tanks 56 and 78 have not been reconstructed or modified since 1984, but are listed for completeness.*

40 CFR 60.7 requires a semiannual report for these tanks.

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JUL 14 2010

Air/Toxics & Inspection
Coordination Branch
BENLA**Spent Acid Tanks Summary Report**

Pollutant	VOC
Reporting period dates:	1/1/2010 to 6/30/2010
Company:	Rhodia Inc. Houston site
Emission Limitation:	25.93 lbs/hr when venting to secondary APVC (vapor combustor)
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Spent Acid Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
a. Startup/shutdown	0 hours
b. Control equipment problems	322.4 hours
c. Process problems	0.0 hours
d. Other known causes	0.0 hours
e. Unknown causes	0.0 hours
Total duration of excess emission	322.4 hours
Total duration of excess emissions	7.42 %

TS Tanks Summary Report

Pollutant	VOC
Reporting period dates:	1/1/2010 to 6/30/2010
Company:	Rhodia, Inc. Houston site
Emission Limitation:	22.22 lbs/hr when venting to TSVC
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Treatment Services Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
f. Startup/shutdown	0 hours
g. Control equipment problems	0.0 hours
h. Process problems	0.0 hours
i. Other known causes	0.0 hours
j. Unknown causes	0 hours
Total duration of excess emission	0.0 hours
Total duration of excess emissions	0.0 %

If you have any questions concerning this matter, please call Samuel E. Keen, PE at (713) 924-1484.

Sincerely,



William McConnell
Plant Manager

Attachment

Cc: Executive Director, MC-109
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Air Section Manager
Texas Commission on Environmental Quality
5425 Polk Avenue, Suite H
Houston, TX 77023-1486

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441

**Rhodia Houston Plant
NSPS Kb Semiannual Report
Excess Emission Summary
1/1/2010 to 6/30/2010 Reporting Period**

Date	Time of Incident	Incident Number	Control Device	Event	Event Duration	total hours	VOCs Emitted (total lbs)	VOCs Emitted (average lbs/hr*)
1/8/2010	6:36 AM	IR-ECO-HO-2010-9	EPN 170	Total Plant Power Failure due to cold weather. Vapor combustor not in operation.	71 hours, 2 minutes	71.03	1595.20	22.46
1/30/2010	12:30 AM	IR-ECO-HO-2009-23	EPN 170	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	2 days, 16 hours, 58 minutes	64.97	715.50	11.01
4/9/2010	12:20 AM	IR-ECO-HO-2010-79	EPN 170	Unit shutdown due to high water in plant. Vapor combustor not in operation.	25 hours, 10 minutes	25.17	600.80	23.87
4/20/2010	1:44 PM	IR-ECO-HO-2010-88	EPN 170	Failure of valve caused SO2 emissions through non-working vapor combustor	5 days, 19 hours, 49 minutes	139.72	1379.20	9.87
5/3/2010	12:00 AM	IR-ECO-HO-2010-114	EPN 170	Planned outage in unit without proper vapor combustor operation	21 hours, 28 minutes	21.47	58.10	2.71

322.4

11/11/10



Eco Services Enterprise
Houston Plant

Vol. 6
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JUL 20 2010

Operations & Inspection
Compliance Branch
ENJ-A

CERTIFIED MAIL; RETURN RECEIPT REQUESTED: (7010 0290 0000 3114 0765)

July 14, 2010

Texas Commission on Environmental Quality
Office of Permitting, Remediation and Registration
Air Permits Division, MC-163
P.O. Box 13087
Austin, Texas 78711-3087

Subject: Rhodia Inc. (CN600125330)
Houston Plant (RN100220581)
Consent Decree (Civil Action No. 2:07CV134 WL)
Air Permit 19282 and PSD-TX-1081
Excess Emission Report for SO₂ per 40 CFR 60.7(c)-(d)
Data Assessment Report for SO₂ and O₂ CEMs per 40 CFR Part 60, Appendix F

Dear Sir or Madam:

In accordance with the Consent Decree referenced above, the Rhodia Inc. (Rhodia) Houston No. 8 became subject to 40 CFR Part 60 Subpart H, Standards of Performance for Sulfuric Acid Plants on November 19, 2008. Further, the Consent Decree specifies a SO₂ emission standard that is more stringent than Subpart H and also incorporates an EPA-approved Alternative Monitoring Plan (AMP). As such, the semiannual excess emission report required by 40 CFR 60.7(c)-(d) and the semiannual data assessment report (DAR) required by 40 CFR Part 60 Appendix F, Procedure 1, Section 7 will address compliance with respect to the more stringent CD requirements and the AMP. These reports are attached for the January 1 to June 30, 2010 semiannual reporting period.

The relevant SO₂ standards required by the CD and AMP are as follows:

- Per CD paragraph 11.b.i, emissions of SO₂ are not to exceed a long term limit of 1.70 pounds per ton of 100% sulfuric acid produced (averaged over all operating hours in a rolling 365-day period).
- Per CD paragraph 11.b.ii, emissions of SO₂ are not to exceed a short term limit of 3.00 pounds per ton of 100% sulfuric acid produced (averaged over each rolling 3-hour period). This limit does not apply during periods of startup, shutdown, and malfunction.

As discussed in the AMP, Rhodia uses dual analyzers to determine the conversion factor for converting monitoring data (ppm SO₂ and % O₂) into units of the standard (lbs/ton). This exceeds the "three times daily" minimum discussed in 40 CFR 60.84(b).

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JUL 20 2010

Air/Toxics & Inspection
Coordination Branch
6EN-A

NSPS Excess Emissions Report
January – June, 2010

General Information:

Pollutant:	Sulfur Dioxide (SO ₂)
Reporting period dates:	January 1 – June 30, 2010
Emission Limitation:	3.00 lbs/ton short-term, 1.70 lbs/ton long-term
Address:	8615 Manchester Street, Houston, Texas 77012
Process Unit Description (Source Unit No):	No. 8 Sulfuric Acid Unit
Monitor Manufacturer and Model No (Stack SO ₂):	Ametek Model 920
Date of Latest CEMS Certification or Audit (Stack):	June 9, 2010
CEMS span values per the AMP (Stack) ⁽¹⁾ :	Dual range: Normal: 0 – 500 ppm SO ₂ SSM: 0 – 3,600 ppm SO ₂

Notes:

⁽¹⁾ Refer to EPA approved Alternative Monitoring Plan for the Houston No. 8 Unit.

NSPS Excess Emissions Report
January – June, 2010

Emission data summary – Long-Term Limit (Effective June 30, 2010)

1. Duration of excess emissions (as defined per CD and AMP) in reporting period due to:	
a. Startup/shutdown	0 hours
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total duration of excess emission	0 hours
3. Total duration of excess emissions as percent of total source operating time	0%

Emission data summary – Short-Term Limit

1. Duration of excess emissions (as defined per CD and AMP) in reporting period due to:	
a. Startup/shutdown	NA – limit does not apply during startup/shutdown
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total duration of excess emission	0 hours
3. Total duration of excess emissions as percent of total source operating time	0%

NSPS Excess Emissions Report
January – June, 2010

Stack SO₂ Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	25 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	98.1 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	123.1 hours ⁽¹⁾
3. Total CEMS Downtime as percent of total source operating time	2.8 %

Stack O₂ Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	18.25 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	98.1 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	116.35hours ⁽¹⁾
3. Total CEMS Downtime as percent of total source operating time	2.7 %

⁽¹⁾ The Houston #8 Unit followed procedures specified in an EPA approved Alternative Monitoring Plan (AMP) for CEMS malfunctions. In accordance with the AMP, during CEMS malfunctions lasting more than 24 continuous hours Rhodia generally:

- Conducted sampling with hand held monitors when the stack SO₂ and O₂ CEMS malfunctioned.

NSPS Excess Emissions Report
January – June, 2010

Data Assessment Reports (DARs) per 40 CFR Part 60 Appendix F

Analyzer/Pollutant/Units	Reporting Period	Accuracy Assessment			Any out-of-control periods for Calibration Drift Assessment? **
		Type (RATA, CGA, or RAA)	Any Out-of-Control Periods? +	Notes	
Stack SO ₂ , ppm	1Q10	RATA	No		No
		3/17 -18/10			
	2Q10	CGA 5/30/10	No		No
		RATA	No		
Stack O ₂ , %	1Q10	RATA	No		No
		3/17 -18/10			
	2Q10	CGA 5/30/10	No		No
		RATA	No		
		6/9/2010			

Describe any changes since last quarter in CEMS, process or controls:

There have been no changes in the CEMS, process, or controls since the unit was started on November 19, 2008 .

***** Certification Statement for Summary Report per 40 CFR 60.7(d)*****

I certify that the information contained in this report is true, accurate, and complete.

____ William McConnell _____

Name of Responsible Official

Signature

____ Plant Manager _____

Title

Date

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

**RHODIA INC.
HOUSTON PLANT
VIRGIN SULFURIC ACID UNIT NO. 8 (EPN 101)
OXYGEN (O₂) AND SULFUR DIOXIDE (SO₂)
CONTINUOUS EMISSION MONITORING SYSTEM (CEMS)
RELATIVE ACCURACY TEST AUDIT (RATA)
(REGULATED ENTITY NO. RN100220581; CUSTOMER REFERENCE NO. CN600125330
TCEQ ACCOUNT ID NO. HG-0697-O; PERMIT NO. 19282)**

(ENTECH REPORT NO. ER2010-04-103)

**PREPARED BY

ENTECH ENGINEERING INC.
LEAGUE CITY, TEXAS**

MARCH 2010

**PREPARED FOR

RHODIA INC.
HOUSTON, TEXAS**

**SAMPLING LOCATION

VIRGIN SULFURIC ACID UNIT NO. 8 STACK (EPN 101)
RHODIA INC.
HOUSTON, HARRIS COUNTY, TEXAS**

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

SECTION 1.0 SUMMARY

Entech Engineering Inc. (Entech) was retained by Rhodia Inc. (Rhodia) to conduct an oxygen (O_2) and sulfur dioxide (SO_2) Continuous Emission Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) at Rhodia's Virgin Sulfuric Acid Unit No. 8 in Houston, Harris County, Texas. The objective of this program was to quality assure the continuous performance of the O_2 and SO_2 CEMS according to the specifications of EPA 40 CFR, Part 60, Appendix F.

In this program, the quality assurance test, i.e. RATA was conducted according to the 40CFR60, Appendix F, Section 5.1.1 specifications following the procedures of 40CFR60, Appendix B, Performance Specification 2 and 3 for the SO_2 and O_2 CEMS, respectively. A Performance Specification (PS) test consists of two parts, a Calibration Drift (CD) Determination and a Relative Accuracy (RA) Determination; however, a RATA only requires that the RA determination be conducted. For this program, the RATA was conducted on March 17 and 18, 2010 and was coordinated by Mr. Wesley Carter of Rhodia Inc. TCEQ was notified of the test, but did not attend.

The Virgin Sulfuric Acid Unit No. 8 is designated in the Texas Commission on Environmental Quality (TCEQ) permit as Emission Point Number (EPN) 101. Its CEMS comprises of a Bovar/Western Research O_2/SO_2 analyzer (Model 920, Serial Number VE-920-8700-2). Flue gas samples are continuously extracted from the stack for analysis on a wet basis. During testing, operational parameters were monitored and recorded by Rhodia personnel at fifteen-minute intervals for demonstration of process conditions.

Results of the O_2 and SO_2 CEMS RATA results are presented in Table 1. A comprehensive summary which includes individual test data is presented in Table 2 and 3. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

ENTECH ENGINEERING INC.

P.O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

Table 1.
Rhodia Inc.
Houston Plant
Virgin Sulfuric Acid Unit No. 8 (EPN 101)
Oxygen(O₂) and Sulfur Dioxide (SO₂) CEMS Relative Accuracy Test Audit (RATA)
Regulated Entity No. RN100220581; Customer Reference No. CN600125330
TCEQ Account ID No. HG-0697-O; Permit No. 19282
March 17 and 18, 2010

Performance Specification Test Parameters	Continuous Emission Monitoring Systems (CEMS)	
	Oxygen (O ₂)	Sulfur Dioxide (SO ₂)
RA Test	NA	Failed
RA Allowed	+/- 1.0% O ₂	20% (RM) or 10% (STD)
RA	NA	11.32% (STD)

(RM) - Reference Method

(STD) - Emission Standard or Performance Specification Standard

RA - Relative Accuracy Test

NA - Not Applicable

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

June 11, 2010

Mr. Floyd Dickerson
Environmental Manager, Eco Services
Rhodia Inc.
8615 Manchester
Houston, Texas 77012

SUBJECT: TRANSMITTAL OF ENTECH REPORT NO. ER2010-06-173 ENTITLED "RHODIA INC., HOUSTON PLANT, VIRGIN SULFURIC ACID UNIT NO. 8 (EPN 101) OXYGEN (O₂) AND SULFUR DIOXIDE (SO₂) CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) RELATIVE ACCURACY TEST AUDIT (RATA) (REGULATED ENTITY NO. RN100220581; CUSTOMER REFERENCE NO. CN600125330; TCEQ ACCOUNT ID NO. HG-0697-O; PERMIT NO. 19282)"

Entech Engineering Inc. conducted a RATA on the Virgin Sulfuric Acid Unit No. 8 (EPN 101) O₂ and SO₂ CEMS on June 9, 2010. The program was performed under Rhodia Inc.'s verbal purchase order.

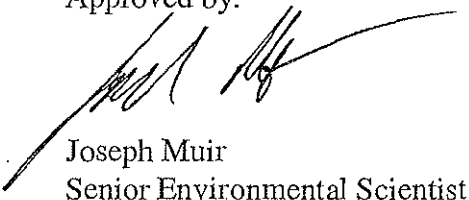
Three copies and one CD of the Entech Engineering final report that documents the findings and results of this program are enclosed. Please note that the results presented in this report only relate to the items tested or the samples as received by Entech's lab; further, this report will not be reproduced, without the written approval of the client. Please contact us at our League City, Texas office if you have any questions or comments concerning the findings of this program.

Sincerely,



Jared Vawter
Environmental Scientist II

Approved by:



Joseph Muir
Senior Environmental Scientist

Approved by:



Edward J. Pasternak
Technical Manager

ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

SECTION 1.0 SUMMARY

Entech Engineering Inc. (Entech) was retained by Rhodia Inc. (Rhodia) to conduct an oxygen (O_2) and sulfur dioxide (SO_2) Continuous Emission Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) at Rhodia's Virgin Sulfuric Acid Unit No. 8 in Houston, Harris County, Texas. The objective of this program was to quality assure the continuous performance of the O_2 and SO_2 CEMS according to the specifications of EPA 40 CFR, Part 60, Subpart G and Permit # 19282.

In this program, the quality assurance test, i.e. RATA was conducted according to the 40CFR60, Appendix F, Section 5.1.1 specifications following the procedures of 40CFR60, Appendix B, Performance Specification 2 and 3 for the SO_2 and O_2 CEMS, respectively. A Performance Specification (PS) test consists of two parts, a Calibration Drift (CD) Determination and a Relative Accuracy (RA) Determination; however, a RATA only requires that the RA determination be conducted. For this program, the RATA was conducted on June 9, 2010 and was coordinated by Mr. Wesley Carter of Rhodia Inc. TCEQ was notified of the test, but did not attend.

The Virgin Sulfuric Acid Unit No. 8 is designated in the Texas Commission on Environmental Quality (TCEQ) permit as Emission Point Number (EPN) 101. Its CEMS comprises of a Bovar/Western Research O_2/SO_2 analyzer (Model 920, Serial Number VE-920-8700-2). Flue gas samples are continuously extracted from the stack for analysis on a wet basis. During testing, operational parameters were monitored and recorded by Rhodia personnel at one-minute intervals for demonstration of process conditions.

Results of the O_2 and SO_2 CEMS RATA results are presented in Table 1. A comprehensive summary which includes individual test data is presented in Table 2. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

ENTECH ENGINEERING INC.

P.O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

Table 1.
Rhodia Inc.
Houston Plant
Virgin Sulfuric Acid Unit No. 8 (EPN 101)
Oxygen(O₂) and Sulfur Dioxide (SO₂) CEMS Relative Accuracy Test Audit (RATA)
Regulated Entity No. RN100220581; Customer Reference No. CN600125330
TCEQ Account ID No. HG-0697-O; Permit No. 19282
June 9, 2010

Performance Specification Test Parameters	Continuous Emission Monitoring Systems (CEMS)	
	Oxygen (O ₂)	Sulfur Dioxide (SO ₂)
RA Test	Passed	Passed
RA Allowed	+/- 1.0% O ₂	20% (RM) or 10% (STD)
RA	NA	14.05% (RM)

(RM) - Reference Method

(STD) - Emission Standard or Performance Specification Standard

RA - Relative Accuracy Test

NA - Not Applicable



Eco Services - Houston

Quarterly Cylinder Gas Audit Checklist Stack SO₂ Analyzer

Unit Number (Circle One):

2

(8) Low Range

Date: 5/30/10 Time: 9:00

Technician: Paul Barnett

Serial Number: VE-920-8700-2

Signature: Paul Barnett

Cylinder ID number	ALM048359		ALM049305			
Date of Certification	3/31/2009		4/9/2009			
Type of certification (e.g. EPA Protocol 1 or CRM).	126 ppm SO ₂ EPA Protocol 1		272 ppm SO ₂ EPA Protocol 1			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C _a (ppm)	126 ppm	272 ppm	126	272	126	272
CEM Response value C _m (ppm)	125 ppm	274 ppm	124	273	125	275
Accuracy A (% or ppm)	-1 ppm	+2 ppm	-2 ppm	+1 ppm	-1 ppm	+3 ppm

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY Gases Project No.: 2334-001 PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM048359 Certification Date: Mar2009 Exp. Date: 1Mar2011

Cylinder Pressure***: 1950 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4PM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	23Mar2009	FTIR
FTIR//000929060	11Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis Second Triad Analysis Calibration Curve

OXYGEN

Date: 25Mar2009 onse Unit: VOLLT

Z1=0.000001=0.99000T1=0.22180

R2=0.989702=0.00070T2=0.22100

Z3=0.000803=0.22070R3=0.98900

Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=.9999978

Constants: A=-.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.00023=254.19041=124.6734

R2=254.2501=0.15346T2=125.0360

Z3=0.258713=125.31913=254.2770

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.03914=254.1434=125.7700

R2=254.4486=0.084472=126.0405

Z3=0.170743=126.1121=254.6616

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99995E-1

Constants: A=0.00000E+0

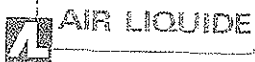
B=9.97420E-1=0.00000E+0

D=0.00000E+0=0.00000E+0

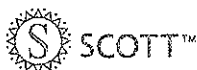
Special Notes: PAS00021

APPROVED BY:

Ramien JR



Air Liquide America
Specialty Gases LLC



RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas

Assay Laboratory

AIR LIQUIDE AMERICA SPECIALTY GASES LLC
9810 BAY AREA BLVD
PASADENA, TX 77507

P.O. No.: ALAS-44414/32924056
Project No.: 04-72466-002

Customer

RHODIA INC
PO#4500699213
8615 MANCHESTER
HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards; Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: 09Apr2009 Exp. Date: 09Apr2011
Cylinder Pressure***: 1912 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	13.6 %	+/- 1%	
SULFUR DIOXIDE *	272 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pro

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51 %	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4 PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
SERVOMEX/MODEL 244A/701/716	23Mar2009	PARAMAGNETIC
FTIR/000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z = Zero Gas R = Reference Gas T = Test Gas r = Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 08Apr2009	Response Unit: VOLTS
Z1 = 0.00000	R1 = 0.99000 T1 = 0.57210
R2 = 0.99000	Z2 = 0.00000 T2 = 0.57170
Z3 = 0.00000	T3 = 0.57140 R3 = 0.98950
Avg. Concentration:	13.56 %

Concentration = A + Bx + Cx2 + Dx3 + Ex4
r = 0.9999978
Constants: A = -0.00703813
B = 23.71576885 C =
D = E =

SULFUR DIOXIDE *

Date: 02Apr2009	Response Unit: PPM
Z1 = -0.17978	R1 = 255.8503 T1 = 273.1567
R2 = 255.9913	Z2 = 0.38507 T2 = 274.0137
Z3 = 0.38875	T3 = 274.3073 R3 = 256.2128
Avg. Concentration:	272.1 PPM

Date: 09Apr2009	Response Unit: PPM
Z1 = -0.64785	R1 = 255.2667 T1 = 273.4320
R2 = 255.3414	Z2 = -0.17780 T2 = 273.9350
Z3 = 0.04655	T3 = 274.0129 R3 = 255.5704
Avg. Concentration:	272.7 PPM

Concentration = A + Bx + Cx2 + Dx3 + Ex4
r = 9.99988E-1
Constants: A = 0.00000E+0
B = 1.00080E+0 C = 3.00000E-6
D = 0.00000E+0 E = 0.00000E+0

Special Notes:

LOT # PAS00063

APPROVED BY:

Peter Brandon



Eco Services - Houston

Quarterly Cylinder Gas Audit Checklist Stack SO₂ Analyzer

Unit Number (Circle One):

2

(8) High Range

Date: 5/30/10

Time: 9:30

Technician: Paul Barnett

Serial Number: VE-920-8700-2

Signature: Paul Barnett

Cylinder ID number	ALM049888		ALM056870			
Date of Certification	3/31/2009		3/31/2009			
Type of certification (e.g. EPA Protocol 1 or CRM).	921 ppm SO ₂ EPA Protocol I		2000 ppm SO ₂ EPA Protocol I			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C _a (ppm)	921	2000	921	2000	921	2000
CEM Response value C _m (ppm)	925	1999	924	1999	923	2001
Accuracy A (% or ppm)	+ 4 ppm	- 1 ppm	+ 3 ppm	- 1 ppm	+ 2 ppm	+ 1 ppm

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32924643IA

AIR LIQUIDE AMERICA SPECIALTY Gases Project No.: 2341-001 PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM049888 Certification Date: Mar2009 Exp. Date: 1Mar2012

Cylinder Pressure***: 1968 psig

ANALYTICAL

COMPONENT

CERTIFIED CONCENTRATION (Moles) ACCURACY** TRACEABILITY

SULFUR DIOXIDE *

921

PPM

+/- 1%

Direct NIST and NMI

NITROGEN

BALANCE

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM_NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 1662	15May2010	KAL003254	975.0PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

FTIR//000929060

DATE LAST CALIBRATED

12Mar2009

ANALYTICAL PRINCIPLE

FTIR

ANALYZER READINGS

(Z=Zero Gas	R=Reference Gas	T=Test Gas	r=Correlation Coefficient)
First Triad Analysis	Second Triad Analysis		Calibration Curve

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.21684=975.66891=921.6842

R2=976.8102=-0.119112=921.6935

Z3=0.305253=922.84413=977.0351

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.01294=976.8492=923.0907

R2=977.8269=0.272432=923.4876

Z3=0.506993=923.6709=978.0656

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99988E-1

Constants: A=0.00000E+0

B=1.00080E+0=3.00000E-6

D=0.00000E+0=0.00000E+0

Special Notes: DOC# PAS00013

APPROVED BY:

Ramien JR



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: EPA Protocol Gas

Assay Laboratory

Customer

P.O. No.: ALAS-44414/32924771IA

AIR LIQUIDE AMERICA SPECIALTY GAS Project No.: 2342-001

PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards

Procedure G-1; September, 1997.

Cylinder Number:

ALM056870

Certification Date: Mar2009

Exp. Date: 1Mar2012

Cylinder Pressure***: 1961 PSIG

ANALYTICAL

COMPONENT

CERTIFIED CONCENTRATION (Moles)

ACCURACY**

TRACEABILITY

SULFUR DIOXIDE *

2,000

PPM

+/- 1%

Direct NIST and NMI

NITROGEN

BALANCE

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM_NO. EXPIRATION DATE CYLINDER NUMBER CONCENTRATION COMPONENT

NTRM 1664

02Oct2011

ALM059631

2402.PPM

SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

FTIR//000929060

DATE LAST CALIBRATED

12Mar2009

ANALYTICAL PRINCIPLE

FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)
First Triad Analysis Second Triad Analysis Calibration Curve

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.09484=2383.3091=1982.431

R2=2384.241=0.52271T2=1983.385

Z3=0.959453=1984.8833=2385.906

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.10409=2384.951=1985.128

R2=2386.811=0.440912=1986.040

Z3=0.794043=1986.489=2387.704

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99988E-1

Constants: A=0.00000E+0

B=1.00080E+0=3.00000E-6

D=0.00000E+0=0.00000E+0

Special Notes: DOC# PAS00014

APPROVED BY:

Ramien JR

Page 1 of 1



Eco Services - Houston

Quarterly Cylinder Gas Audit Checklist Stack O₂ Analyzer

Unit Number (Circle One):

2

⑧

Date: 5/30/10 Time: 9:00

Technician: Paul Barnett

Serial Number: VE-920-8700-2

Signature: Paul Barnett

Cylinder ID number	<u>ALM048359</u>		<u>ALM049305</u>			
Date of Certification	<u>3/31/2009</u>		<u>4/9/2009</u>			
Type of certification (e.g. EPA Protocol 1 or CRM).	<u>5.25% O₂</u> <u>EPA Protocol 1</u>		<u>13.6%</u> <u>EPA Protocol</u>			
	Trial 1		Trial 2		Trial 3	
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value C_a (ppm)	<u>5.25%</u>	<u>13.6%</u>	<u>5.25%</u>	<u>13.6%</u>	<u>5.25%</u>	<u>13.6%</u>
CEM Response value C_m (ppm)	<u>5.26%</u>	<u>13.6%</u>	<u>5.25%</u>	<u>13.5%</u>	<u>5.24%</u>	<u>13.6%</u>
Accuracy A (% or ppm)	<u>+0.01%</u>	<u>0%</u>	<u>0%</u>	<u>-0.1%</u>	<u>-0.01%</u>	<u>0%</u>

where $A = \frac{(C_m - C_a)}{C_a} \times 100$



Scott Specialty Gases

www.scottgas.com

RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory

Customer

P.O. No.: ALAS-44414/32923999IA

AIR LIQUIDE AMERICA SPECIALTY GAs Project No.: 2334-001 PO#4500699213

9810 BAY AREA BLVD

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards Procedure G-1; September, 1997.

Cylinder Number: ALM048359 Certification Date: Mar2009 Exp. Date: 1Mar2011

Cylinder Pressure***: 1950 PSIG

ANALYTICAL

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ACCURACY**	TRACEABILITY
OXYGEN	5.25 %	+/- 1%	Direct NIST and NMI
SULFUR DIOXIDE *	126 PPM	+/- 1%	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4PM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
FTIR//000929060	23Mar2009	FTIR
FTIR//000929060	11Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis	Second Triad Analysis	Calibration Curve
----------------------	-----------------------	-------------------

OXYGEN

Date: 25Mar2009 onse Unit: VOLLT

Z1=0.000001=0.99000T1=0.22180

R2=0.989702=0.00070T2=0.22100

Z3=0.000803=0.22070R3=0.98900

Avg. Concentration: %

Concentration=A+Bx+Cx2+Dx3+Ex4

r=.9999978

Constants: A=-.00703813

B=23.71576885

D= E=

SULFUR DIOXIDE *

Date: 24Mar2009 onse Unit: PPM

Z1=-0.00023=254.19041=124.6734

R2=254.2501=0.15346T2=125.0360

Z3=0.258713=125.31913=254.2770

Avg. Concentration: PPM

Date: 31Mar2009 onse Unit: PPM

Z1=-0.03914=254.1434=125.7700

R2=254.4486=0.084472=126.0405

Z3=0.170743=126.1121=254.6616

Avg. Concentration: PPM

Concentration=A+Bx+Cx2+Dx3+Ex4

r=9.99995E-1

Constants: A=0.00000E+0

B=9.97420E-1=0.00000E+0

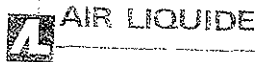
D=0.00000E+0=0.00000E+0

Special Notes: PAS00021

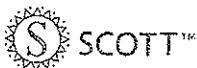
APPROVED BY:

Ramien JR

Page 1 of 1



Air Liquide America
Specialty Gases LLC



RATA CLASS

Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

TM

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas

Assay Laboratory

AIR LIQUIDE AMERICA SPECIALTY GASES LLC
9810 BAY AREA BLVD
PASADENA, TX 77507

P.O. No.: ALAS-44414/32924056

Project No.: 04-72466-002

Customer

RHODIA INC
PO#4500699213
8615 MANCHESTER
HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards; Procedure G-1; September, 1997.

Cylinder Number: ALM049305 Certification Date: 09Apr2009 Exp. Date: 09Apr2011
Cylinder Pressure***: 1912 PSIG

COMPONENT	CERTIFIED CONCENTRATION (Moles)	ANALYTICAL ACCURACY**	TRACEABILITY
OXYGEN	13.6 %	+/- 1 %	
SULFUR DIOXIDE *	272 PPM	+/- 1 %	Direct NIST and NMI
NITROGEN	BALANCE		

*** Do not use when cylinder pressure is below 150 psig.

** Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pro

REFERENCE STANDARD

TYPE/SRM NO.	EXPIRATION DATE	CYLINDER NUMBER	CONCENTRATION	COMPONENT
NTRM 2350	01Apr2012	A6820	23.51 %	OXYGEN
NTRM 0260	02Oct2012	ALM038515	254.4 PPM	SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#	DATE LAST CALIBRATED	ANALYTICAL PRINCIPLE
SERVOMEX/MODEL 244A/701/716	23Mar2009	PARAMAGNETIC
FTIR//000929060	12Mar2009	FTIR

ANALYZER READINGS

(Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 08Apr2009	Response Unit: VOLTS
Z1=0.00000 R1=0.99000 T1=0.57210	
R2=0.99000 Z2=0.00000 T2=0.57170	
Z3=0.00000 T3=0.57140 R3=0.98950	
Avg. Concentration: 13.56 %	

Concentration = A + Bx + Cx2 + Dx3 + Ex4
r = 0.9999978
Constants: A = -0.00703813
B = 23.71576885 C =
D = E =

SULFUR DIOXIDE *

Date: 02Apr2009	Response Unit: PPM
Z1=-0.17978 R1=255.8503 T1=273.1567	
R2=255.9913 Z2=0.38507 T2=274.0137	
Z3=0.38875 T3=274.3073 R3=256.2128	
Avg. Concentration: 272.1 PPM	

Date: 09Apr2009	Response Unit: PPM
Z1=-0.64785 R1=255.2667 T1=273.4320	
R2=255.3414 Z2=-0.17780 T2=273.9350	
Z3=0.04655 T3=274.0129 R3=255.5704	
Avg. Concentration: 272.7 PPM	

Concentration = A + Bx + Cx2 + Dx3 + Ex4
r = 9.99988E-1
Constants: A = 0.00000E+0
B = 1.00080E+0 C = 3.00000E-6
D = 0.00000E+0 E = 0.00000E+0

Special Notes:

LOT # PAS00063

APPROVED BY:

Peter Brandon

AI/Ac/co

(10000460901
RECEIVED

TX07906 JUL 26 2010



Certified Mail; Return Receipt Requested (7010 0290 0000 3114 1113)

July 20, 2010

Mr. David Neleigh
Air Permits Section
6PD-R
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Steve
Thompson

Re: HON Semiannual Report per 40 CFR 63.152(c)
TCEQ Identification Nos.: RN100220581/CN600125330

Dear Mr. Neleigh:

Rhodia, Inc. (Rhodia) is an offsite treatment facility for 40 CFR Part 63 Subpart G (HON) Group 1 wastewater streams and residuals. Rhodia submitted a letter on August 6, 1998 certifying that it will manage and treat any HON-regulated Group 1 wastewater stream or residual removed from a Group 1 wastewater stream in accordance with the applicable requirements in 40 CFR 63.133 through 63.147. On November 8, 2006, Rhodia submitted the Notification of Compliance Status (NCS) Report per 40 CFR 63.152(b). Per 40 CFR 63.146(c) and 63.152(c), semiannual reports are also required. This submittal includes the semiannual report for the period of January 1 to June 30, 2010.

Specific elements of the semi-annual report are listed below:

63.146(c) - For each tank storing HON Group 1 wastewater or residuals, the results of each inspection in which a control equipment failure (a gasket, joint, lid, cover, or door has a crack or gap, or is broken) was identified. Include the date of the inspection, identification of each waste management unit (tank) in which a control equipment failure was detected, description of the failure, and description of the nature of and date the repair was made.

HON Group 1 wastewater and residuals may be stored in one or more of the six (6) Treatment Services (TS) tanks. There were no control equipment failures identified for these tanks in the reporting period.

63.146(d) - Treatment process monitoring data.

The treatment process is a RCRA unit and is exempt from monitoring per 63.138(h).

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. David Neleigh

Page 2

63.146(e)(1), Table 20 item (1) - For each tank storing HON Group 1 wastewater or residuals that vents to a thermal incinerator for vapor control, report all daily average temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected.

The TS tanks normally vent to the Regeneration Unit No. 2 (Regen 2) sulfuric acid furnace which is exempt from monitoring per 63.139(d)(4)(iv). In the event that Regen 2 is unavailable, tank vapors are routed to the Treatment Services Vapor Combustor (TSVC). The TSVC minimum combustion temperature is 1,500°F per operating permit. During this reporting period, there were no instances of the daily average TSVC combustion temperature being under 1,500°F while TS tanks were venting to it. There were no days when insufficient monitoring data were collected during this reporting period.

63.146(e)(1), Table 20 item (8)(i) and 63.148(j)(2) – For closed vent systems used to convey HON wastewater tank vapors to a control device, any bypass valves and lines must be equipped with a flow indicator or car-seal. Report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor (flow indicator) is not operating.

The vent stream was not diverted to the atmosphere this reporting period. We do not use flow indicators for this purpose.

63.146(e)(1), Table 20 item (8)(ii) and 63.148(j)(3) - Report the times and durations of any periods when the bypass valves are moved to the diverting position, the seal has been changed, the seal mechanism is broken, or the key to unlock the bypass line valve was checked out.

There were no bypass valve or car-seal abnormalities this reporting period. We do not use lock-and-key mechanisms for this purpose.

Please contact Floyd Dickerson at 713-924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Al/H/Co 110000460901 Steve Thompson
079 TX V.6



RECEIVED

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1106)

JUL 26 2010

Toxics & Inspection
Coordination Branch
6L

July 21, 2010

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
April 1, 2010 to June 30, 2010
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh

Page 2

- Pursuant to 61.357(d)(7)(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Sam Keen at (713) 924-1484 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

RECEIVED

JUL 26 2010

Air/Toxics & Inspection
Coordination Branch
SEAL

Table 1

Rhodia Inc.
Houston, Texas
Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: June 30, 2010

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
Initial and annual Method 21 inspections of containers per 61.345(a)(1)	x Yes Except as Noted	
Initial and quarterly visual inspections of containers per 61.345(b)	x Yes Except as Noted	
Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii)	x Yes Except as Noted	
Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f)	x Yes Except as Noted	
Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c)	x Yes Except as Noted	

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Al/Al/co T079
V6

11.0000460901
Steve
Thompson



Eco Services Enterprise
Houston Plant

RECEIVED

NOV 4 - 2010

Air/Toxics & Inspection
Coordination Branch

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1212)

October 27, 2010

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
July 1, 2010 to September 30, 2010
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

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- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh
Page 2

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Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

RECEIVED

NOV 4 - 2010

Air/Toxics & Inspection
Coordination Branch

Table 1

Rhodia Inc.
Houston, Texas**Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: September 30, 2010**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
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Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

AY/Ar/co

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Steve
Thompson

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Eco Services Enterprise
Houston Plant

RECEIVE

APR 25 2011

air/Toxics & Inspection
Coordination Branch
SENA

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1558)

April 18, 2011

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
January 1, 2011 to March 31, 2011
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh
Page 2

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- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

RECEIVE

APR 25 2011

Air/Toxics & Inspection
Coordination Branch
SENL

Table 1

Rhodia Inc.
Houston, Texas

**Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: March 31, 2011**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
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Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Ac/AI/co

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RECEIVE

1079
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MAR 8 - 2011



Air Toxics & Inspection
Coordination Branch

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (70101 0290 0000 3114 1267)

February 28, 2011

Mr. Jeff Robinson
Air Permits Section
Mail Code 6PD-R
U.S. EPA - Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Steve
Thompson

RE: Benzene Waste Operations NESHAP
Industrial Solid Waste Registration No. 31019
Hazardous Waste Permit No. HW-50095-001
40 CFR Part 61, Subpart FF
EPA ID No. TXD008099079

Dear Mr. Robinson:

Enclosed please find a report for the 2010 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 137.7 megagrams for the operating year 2010.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2010.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson
Environmental Manager

Attachment

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

CC: Air Section Manager, TCEQ, Region 12, Houston
Arturo Blanco, City of Houston, Bureau of Air Control

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

RHODIA, INC.
HOUSTON PLANT
HOUSTON, TEXAS

40CFR Part 61, Subpart FF
National Emission Standards for Hazardous Air Pollutants
Benzene Waste Operations - Year 2004

RECEIVE

MAR 8 - 2011

Air/Toxics & Inspection
Coordination Branch
SENA

40 CFR 61 Subpart FF - Benzene Annual Report

61.357(a)(2)		61.357(a)(3)(i)	61.357(a)(3)(ii)	61.357(a)(3)(iii)	61.357(a)(3)(iv)	61.357(a)(3)(v)	61.357(a)(3)(vi)
Waste Stream	Controlled Benzene Emissions	Water Content of Waste Stream >10%	Waste Stream a Process Wastewater Stream, Product Tank Drawdown, or Landfill Leachate	Annual Waste Quantity (Mg/yr)	Range of Benzene Concentration (ppmw)	Annual Average Flow Weighted Benzene Concentration (ppmw)	Annual Benzene Quantity (Mg/yr)
1011006	Y	Y	Y	19.1	0-2	2	0.0
9808003	Y	Y	Y	316.1	0-100,000	100,000	31.6
9109003	Y	Y	Y	902.1	0-10	10	0.0
0911001	Y	N	N	21.2	60-88	88	0.0
0712002	Y	N	N	98.2	0-5	5	0.0
0710004	Y	N	N	150.2	0-1,000	1,000	0.2
9104004	Y	N	N	143.9	10-200	200	0.0
0312003	Y	N	N	387.9	0-10	10	0.0
0312002	Y	N	N	2018.5	10,000-50,000	50,000	101.0
9612008	Y	Y	Y	28.0	10-10,000	10,000	0.3
1001003	Y	N	N	82.8	0-5,000	5,000	0.4
0011009	Y	Y	N	75.3	0-20,000	20,000	1.5
0912006	Y	N	N	1990.6	0-1,000	1,000	2.0
0706008	Y	Y	N	102.6	1-500	500	0.1
0905002	Y	N	N	476.4	0-0.5	1	0.0
9405021	Y	Y	Y	303.1	10-2,000	2,000	0.6
TOTAL						137.7	Mg/yr

Y=Yes, N=No Y=Yes, N=No Y=Yes, N=No

Al/Al/Co

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RECEIVE

JAN 25 2011

Air Toxics & Inspection
Station Branch

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 2387)

January 20, 2011

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
October 1, 2010 to December 31, 2010
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

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Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh

Page 2

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- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Michael Schaffer, Director, Harris County Public Health and Environmental Services

Table 1

**Rhodia Inc.
Houston, Texas
Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: December 31, 2010**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
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Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

AI/AI/co

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RECEIVE

JUL 20 2011

Air/Toxics & Inspection
Coordination Branch
SEN. 1

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1779)

July 14, 2011

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Steve
Thompson

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
April 1, 2011 to June 30, 2011
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

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Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh

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Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

RECEIVED

JUL 20 2011

Air/Toxics & HAPs
Coordination Branch
SEAL

Table 1

Rhodia Inc.
Houston, Texas
Benzene Waste NESHA Inspection Requirements
For Quarterly Period Ending: June 30, 2011

Inspection	Was inspection performed?	Exceptions Noted
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Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012



RHODIA INC.
8615 MANCHESTER STREET
HOUSTON, TX. 77012

A1/A1/CO
NOS
Eco Services Enterprise
Houston/Baytown Plants

110000460901
079 TX V.6
RECEIVE
JUL 5 - 2011
Air Toxics & Inspection
Coordination Branch
6FN-A

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 1335)

June 24, 2011

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

RE: Rhodia Inc.
Houston, Texas
Title V Semi-Annual Deviation Report
Permit No.: O-01609
Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the semi-annual Title V deviation report for the Rhodia Houston, Texas facility which covers the period from December 10, 2010 to June 9, 2011.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

Sam Keen
Environmental Engineer

Attachments

cc: Chief, Air Branch ✓
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Shankle
Executive Director
Texas Commission on Environmental Quality
MC 109
P.O. Box 13087
Austin, TX 78711-3087

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
Health and Human Services Department
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441



Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION		
A. RN: 100220581	B. CN: 600125330	C. Account No.: HG-0697-O
D. Permit No.: O-01609	E. Project No.:	
F. Area Name: Houston Plant		
G. Company Name: Rhodia Inc.		
II. CERTIFICATION TYPE (Please mark the appropriate box)		
A. <input type="checkbox"/> Responsible Official:	B. <input checked="" type="checkbox"/> Duly Authorized Representative:	
III. SUBMITTAL TYPE (Place an "X" in the appropriate box) (Only one response can be accepted per form)		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
x Other: Title V Semi-Annual Deviation Report		
IV. CERTIFICATION OF TRUTH		
This certification does not extend to information which is designated by the TCEQ as information for reference only.		
I, <u>William McConnell</u> , certify that I am the <u>DAR</u> for this application (Certifier Name printed or typed) (RO or DAR)		
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:		
Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).		
A. Time Period: From <u>12/10/10</u> to <u>6/9/11</u> Start Date* End Date*		
OR		
B. Specific Dates: _____ Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*		
*The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'		
Signature: <u>William McConnell</u>		Signature Date: <u>6/24/2011</u>
Title: Plant Manager		



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided)			
<input type="checkbox"/> New Permit, Registration or Authorization (Core Data Form should be submitted with the program application)			
<input type="checkbox"/> Renewal (Core Data Form should be submitted with the renewal form)		<input checked="" type="checkbox"/> Other	Title V Deviation Report
2. Attachments Describe Any Attachments: (ex. Title V Application, Waste Transporter Application, etc.)			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
3. Customer Reference Number (if issued)		4. Regulated Entity Reference Number (if issued)	
CN 600125330		RN 100220581	

SECTION II: Customer Information

5. Effective Date for Customer Information Updates (mm/dd/yyyy)		4/29/2009	
6. Customer Role (Proposed or Actual) -- as it relates to the Regulated Entity listed on this form. Please check only <u>one</u> of the following:			
<input type="checkbox"/> Owner	<input type="checkbox"/> Operator	<input checked="" type="checkbox"/> Owner & Operator	
<input type="checkbox"/> Occupational Licensee	<input type="checkbox"/> Responsible Party	<input type="checkbox"/> Voluntary Cleanup Applicant	<input type="checkbox"/> Other: _____
7. General Customer Information			
<input type="checkbox"/> New Customer		<input checked="" type="checkbox"/> Update to Customer Information	<input type="checkbox"/> Change in Regulated Entity Ownership
<input type="checkbox"/> Change in Legal Name (Verifiable with the Texas Secretary of State)		<input type="checkbox"/> No Change**	
**If "No Change" and Section I is complete, skip to Section III -- Regulated Entity Information.			
8. Type of Customer:		<input checked="" type="checkbox"/> Corporation	
<input type="checkbox"/> City Government		<input type="checkbox"/> Individual	
<input type="checkbox"/> County Government		<input type="checkbox"/> Sole Proprietorship- D.B.A	
<input type="checkbox"/> Federal Government		<input type="checkbox"/> State Government	
<input type="checkbox"/> Other Government		<input type="checkbox"/> General Partnership	
<input type="checkbox"/> Limited Partnership		<input type="checkbox"/> Other: _____	
9. Customer Legal Name (If an individual, print last name first: ex: Doe, John)		If new Customer, enter previous Customer below	
Rhodia Inc.		End Date: _____	
10. Mailing Address:		8 Cedar Brook	
City		Cranbury	
State		NJ	
ZIP		08512	
ZIP + 4		7500	
11. Country Mailing Information (if outside USA)		12. E-Mail Address (if applicable)	
13. Telephone Number		14. Extension or Code	
(609) 860-4000			
15. Fax Number (if applicable)		(609) 409-2845	
16. Federal Tax ID (9 digits)		17. TX State Franchise Tax ID (11 digits)	
223539954		12235399545	
18. DUNS Number (if applicable)		19. TX SOS Filing Number (if applicable)	
002959810			
20. Number of Employees		21. Independently Owned and Operated?	
<input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

SECTION III: Regulated Entity Information

22. General Regulated Entity Information (If "New Regulated Entity" is selected below this form should be accompanied by a permit application)			
<input type="checkbox"/> New Regulated Entity	<input type="checkbox"/> Update to Regulated Entity Name	<input checked="" type="checkbox"/> Update to Regulated Entity Information	<input type="checkbox"/> No Change** (See below)
**If "NO CHANGE" is checked and Section I is complete, skip to Section IV, Preparer Information.			
23. Regulated Entity Name (name of the site where the regulated action is taking place)			
Rhodia Inc.			

24. Street Address of the Regulated Entity: (No P.O. Boxes)	8615 Manchester Street						
	City	Houston	State	TX	ZIP	77012	ZIP + 4
25. Mailing Address:	8615 Manchester Street						
	City	Houston	State	TX	ZIP	77012	ZIP + 4
26. E-Mail Address:							
27. Telephone Number		28. Extension or Code		29. Fax Number (if applicable)			
(713) 928-3411				(713) 835-3252			
30. Primary SIC Code (4 digits)		31. Secondary SIC Code (4 digits)		32. Primary NAICS Code (5 or 6 digits)		33. Secondary NAICS Code (5 or 6 digits)	
2819				325188			
34. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.)							
Manufacture of sulfuric acid and commercial hazardous waste incineration							

Questions 34 – 37 address geographic location. Please refer to the instructions for applicability.

35. Description to Physical Location:							
36. Nearest City		County		State		Nearest ZIP Code	
Houston		Harris		TX		77012	
37. Latitude (N) In Decimal:			38. Longitude (W) In Decimal:				
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds		
29	43	20	95	16	20		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form or the updates may not be made. If your Program is not listed, check other and write it in. See the Core Data Form instructions for additional guidance.

<input type="checkbox"/> Dam Safety	<input type="checkbox"/> Districts	<input type="checkbox"/> Edwards Aquifer	<input checked="" type="checkbox"/> Industrial Hazardous Waste	<input type="checkbox"/> Municipal Solid Waste
			50095	
<input checked="" type="checkbox"/> New Source Review – Air	<input type="checkbox"/> OSSF	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> PWS	<input type="checkbox"/> Sludge
4802, 19282, 56566				
<input type="checkbox"/> Stormwater	<input checked="" type="checkbox"/> Title V – Air	<input type="checkbox"/> Tires	<input type="checkbox"/> Used Oil	<input type="checkbox"/> Utilities
	O3049			
<input type="checkbox"/> Voluntary Cleanup	<input checked="" type="checkbox"/> Waste Water	<input type="checkbox"/> Wastewater Agriculture	<input type="checkbox"/> Water Rights	<input type="checkbox"/> Other:
	00542			

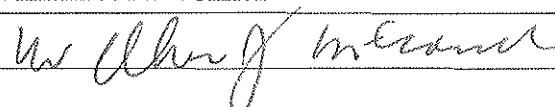
SECTION IV: Preparer Information

40. Name:	Samuel E Keen, PE		41. Title:	Environmental Engineer
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address	
(713) 924-1484		(713) 835-3261	sam.keen@us.rhodia.com	

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 9 and/or as required for the updates to the ID numbers identified in field 39.

(See the Core Data Form instructions for more information on who should sign this form.)

Company:	Rhodia Inc.	Job Title:	Plant Manager
Name (In Print):	William J. McConnell	Phone:	(713) 924-1401
Signature:		Date:	6/24/2011

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.	Account No.	HG-0697-O
Area Name	Regeneration Unit No. 2	Operating Permit No.	O-01609
Report Period Began on	12/10/2010	Report Submittal Date	6/24/2011
And Ended		6/09/2011	

Operating Permit Requirement for Which Deviations are Being Reported							
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)
Unit ID	Group ID						Citation Frequency
Pro-Regen 2		Permit 4802, SC 1	SO2 & SO3	30 TAC 101.201	Standard	REG 2 - 0002	

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2011-4	1/10/11	9:00	1/10/11	19:40	1	Regen 2 converter leak	Repair leak and monitor
IR-ECO-HO-2011-6	1/11/11	7:00	1/11/11	13:00	1	1 st layer converter leak	Repair leak and monitor.
IR-ECO-HO-2011-70	3/21/11	9:30	3/21/11	17:30	1	Gas leak on oleum tower shell	Repair shell leak and monitor
IR-ECO-HO-2011-74	3/23/11	2:00	3/24/11	11:00	1	Oleum leak from analyzer	Repair analyzer to stop pinhole leak
IR-ECO-HO-2011-82	4/15/11	14:20	4/15/11	17:20	1	Oleum tower boot pump housing flange leak	Re-flange pump and monitor
IR-ECO-HO-2011-90	4/25/11	11:00	4/7/11	16:46	1	SO3 leak at flange on absorbing tower inlet	Repair flange and monitor
Total Deviations:					6		

Company Name		Rhodia Inc.			Account No.		HG-0697-O	
Area Name		Tanks S1 and S2			Operating Permit No.		O-01609	
Report Period Began on		12/10/2010		And Ended on		6/09/2011		Report Submittal Date
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
S1 & S2		56566, Special Condition 4	H2S	30 TAC 112.31	Permit Requirement			

Details of Deviations from Above Referenced Requirement							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	9/12/2008		4/1/11	8:00 AM	1	The newly-amended permit requires the stacks on Sulfur Tanks S1 and S2 to reach a minimum height of 60 feet. TCEQ denied Rhodia's request to submit a compliance plan in order to comply with this requirement. Therefore, during the time in which Rhodia seeks an engineering solution to raise the stacks to the required height, the stacks are not compliant with the above-referenced permit condition. The stacks were in place on April 1, 2011	Permit received 9/12/08. Rhodia is currently addressing the engineering, logistical, and safety elements of this project, and seeking qualified designs to complete the work. TCEQ did not accept Rhodia's request to submit a compliance schedule for this work. These stacks were in operation as of April, 2011, and the deviation is mitigated. This deviation has been addressed in Investigation #794145
Total Deviations:					1		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2010		And Ended on		6/09/2011		Report Submittal Date	
6/24/2011									
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation		Frequency
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions				

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2011-8	1/15/11	4:00	1/15/11	9:30	1	Gas leak on #2 boiler expansion joint (recordable emission event)	Repair expansion joint and monitor
IR-ECO-HO-2011-20	2/3/11	20:00	2/3/11	23:00	1	#2 boiler exit duct leak (recordable emission event)	Patch leak in duct and monitor
IR-ECO-HO-2011-29	2/13/11	8:00	2/13/11	16:00	1	#2 boiler expansion joint leak due to freezing (recordable emission event)	Patch leak in joint and monitor
IR-ECO-HO-2011-30	2/13/11	8:00	2/13/11	16:00	1	Minimal process gas leak at economizer manway due to freezing (recordable emission event)	Repair and monitor leak
IR-ECO-HO-2011-32	2/13/11	8:00	2/13/11	16:00	1	Process gas leak at hot end of Boiler #1 due to freezing (recordable emission event)	Repair and monitor leak
IR-ECO-HO-2011-33	2/14/11	6:55	2/14/11	8:07	1	Furnace west thermowell gas leak due to freezing (recordable emission event)	Repair thermowell and monitor
Total Deviations:					6		

Company Name		Rhodia Inc.			Account No.		HG-0697-O	
Area Name		Unit #8			Operating Permit No.		O-01609	
Report Period Began on		12/10/2010		And Ended on		6/09/2011		Report Submittal Date
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions			

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
IR-ECO-HO-2011-34	2/14/11	6:55	2/14/11	8:07	1	Small crack in ducting above jug valve due to freezing (recordable emission event)	Address and repair crack
IR-ECO-HO-2011-72	3/23/11	7:00	3/23/11	15:00	1	Gas leak on south end of furnace (recordable emission event)	Patch and monitor gas leak
IR-ECO-HO-2011-76	3/26/11	7:00	3/26/11	11:00	1	Small leak on west side of Brinks duct (recordable emission event)	Repair leak and monitor
IR-ECO-HO-2011-81	4/14/11	11:00	4/15/11	11:00	1	Small gas leak on southeast side of furnace (recordable emission event)	Repair leak and monitor
IR-ECO-HO-2011-93	5/2/11	15:00	5/1/11	15:10	1	Small gas leak from 84” gas valve (recordable emission event)	Repair valve and monitor
Total Deviations:					5		

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.			Account No.	HG-0697-O
Area Name	Houston Plant			Operating Permit No.	O-01609
Report Period Began on	12/10/2010	And Ended on	6/09/2011	Report Submittal Date	6/24/2011

Operating Permit Requirement for Which Deviations are Being Reported

ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
		Permit O-01609		30 TAC 122	Standard	Reg2-0001		

Details of Deviations from Above Referenced Requirement

(Note: All elements, except Event No. are Required for Each Period of Deviation)

Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	12/10/07				1	Title V Permit Expired without renewal. Renewal application received late and rejected by TCEQ.	Application for new Title V permit submitted in a timely fashion to TCEQ, and application process followed. New Title V Permit issuance is expected in the near term. Application has been held up by EPA objection.
Total Deviations:					1		

Texas Operating Permit Deviation Report Form

Company Name		Rhodia Inc.			Account No.		HG-0697-O		
Area Name		Sulfuric Acid Unit 8			Operating Permit No.		O-01609		
Report Period Began on		12/10/2010		And Ended on		6/09/2011		Report Submittal Date	6/24/2011
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID						Citation	Frequency	
101		Permit 19282 SC 1	PM10		Authorized Emissions	Reg2-0001		continuous	

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
Event No. (Optional)	Deviation Period				# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Start		End				
	Date	Time	Date	Time			
	11/19/08				1	Upon startup of the No. 8 scrubber system, source testing revealed new pollutants, PM10 and PM2.5, which are not permitted. (addressed in Texas Audit Privledge Act report dated 10/9/09)	An air permit amendment addressing these PM10 and PM2.5 emissions will be sought from TCEQ. Testing has occurred, and methodology is currently under review with TCEQ. An application to include PM emissions is to be submitted in July, 2011.
Total Deviations:					1		
Total Deviations:							

Company Name		Rhodia Inc.			Account No.		HG-0697-O	
Area Name		Unit #8			Operating Permit No.		O-01609	
Report Period Began on		12/10/2010		And Ended on		6/09/2011		Report Submittal Date
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)	Pollutant (Rq'd if Applicable)	Regulatory Requirement (Citation Rq'd if Applicable)	Type of Requirement (Rq'd)	SOP or GOP Index Number (See Instructions)	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID						Citation	Frequency
PRO-UNIT 8		Permit 19282, SC 6	SO2 & SO3	30 TAC 112.6(c)	Monitoring			

Details of Deviations from Above Referenced Requirement							
(Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2010-348	12/25/10	9:30	12/25/10	9:35	1	SO2/SO3 CEMS Analyzer out of service due to fault alarm	Analyzer signal was re-established within five minutes. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-39	2/22/11	11:25	2/22/11	12:31	1	Scrubber SO2 CEMS Analyzer taken out of service during RATA. Bypass was used in order to avoid unit trip and to minimize emissions.	RATA was completed quickly, and service was restored to the analyzer. Alternative monitoring plan was followed during outage.
IR-ECO-HO-2011-40	2/23/11	12:30	2/23/11	15:30	1	SO2/SO3 CEMS Analyzer bypassed in order to troubleshoot potential measurement errors. These were identified in RATA.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-66	3/15/11	11:30	3/15/11	12:00	1	SO2/SO3 CEMS analyzer taken out of service to investigate O2 sensor fault.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-68	3/18/11	11:30	3/18/11	12:12	1	SO2/SO3 CEMS analyzer taken out of service to investigate SO2 sensor fault.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-95	5/9/11	18:00	5/9/11	18:50	1	SO2/SO3 CEMS analyzer taken out of service to investigate faulty alarm.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
Total Deviations:					6		

Company Name		Rhodia Inc.				Account No.		HG-0697-O	
Area Name		Unit #8				Operating Permit No.		O-01609	
Report Period Began on		12/10/2010		And Ended on		6/09/2011		Report Submittal Date	
6/24/2011									
Operating Permit Requirement for Which Deviations are Being Reported									
ID Number (Rq'd if Applicable)		Permit Provision No. (Rq'd If Applicable)		Pollutant (Rq'd if Applicable)		Regulatory Requirement (Citation Rq'd if Applicable)		Type of Requirement (Rq'd)	
SOP or GOP Index Number (See Instructions)		Monitoring Requirements (Rq'd as Applicable)							
Unit ID		Group ID		Citation		Frequency			
PRO-UNIT 8				Permit 19282, SC 6		SO2 & SO3		30 TAC 112.6(c)	
Monitoring									

Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)							
IR-ECO-HO-2011-97	5/10/11	15:45	5/10/11	17:35	1	SO2/SO3 CEMS Analyzer out of service due to cylinder gas audit due to repairs performed to repair faulty alarm	Analyzer signal was re-established as soon as cylinder gas audit completed. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-99	5/11/11	00:10	5/11/11	00:28	1	Stack SO2 CEMS Analyzer taken out of service to perform repair.	Repair was completed quickly, and service was restored to the analyzer. Alternative monitoring plan was followed during outage.
IR-ECO-HO-2011-105	5/19/11	7:45	5/19/11	13:43	1	SO2/SO3 CEMS Analyzer bypassed for cylinder gas audit.	Analyzer signal was re-established after CGA. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-106	5/22/11	18:05	5/23/11	8:06	1	Primary Stack CEMS analyzer failed due to error. Repaired as soon as practical. Alternative monitoring plan was initiated immediately.	Analyzer signal was re-established after equipment replacement. Alternative monitoring plan was followed during outage
IR-ECO-HO-2011-116	6/4/11	13:55	6/4/11	16:00	1	SO2/SO3 CEMS analyzer taken out of service for cylinder gas audit.	Analyzer signal was re-established after CGA. Alternative monitoring plan was followed during outage
Total Deviations:					5		

AI/AI/CO

110000460901
Steve

Thompson

7079
V6



Eco Services Enterprise
Houston Plant

RECEIVE

CERTIFIED MAIL: Return Receipt Requested (7007 0220 0000 4422 2240)

OCT 25 2011

Air/Toxics & Inspection
Coordination Branch
6EN-A

October 18, 2011

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
July 1, 2011 to September 30, 2011
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Mr. Neleigh

Page 2

- Pursuant to 61.357(d)(7)(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,



William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

RECEIVE

OCT 25 2011

Air/Toxics & Inspection
Coordination Division
AENLA

Table 1

**Rhodia Inc.
Houston, Texas
Benzene Waste NESHAP Inspection Requirements
For Quarterly Period Ending: September 30, 2011**

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of tank covers and openings per 61.343(c)	x Yes Except as Noted	
Initial and annual Method 21 inspections of containers per 61.345(a)(1)	x Yes Except as Noted	
Initial and quarterly visual inspections of containers per 61.345(b)	x Yes Except as Noted	
Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii)	x Yes Except as Noted	
Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i)	x Yes Except as Noted	
Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f)	x Yes Except as Noted	
Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c)	x Yes Except as Noted	

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.